

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

GREGORY B. CRAIG,

Defendant.

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Case No. 1:19-CR-00125 (ABJ)

NOTICE OF SUPPLEMENT TO JOINT PRETRIAL STATEMENT

Pursuant to the Court's request on Friday, August 2, 2019, the parties have worked together to remove unnecessary items from their exhibit lists. Accordingly, the United States hereby submits this supplement to the parties' joint pretrial statement.

A. Exhibit Lists

The parties are attaching revised exhibit lists as Exhibit 1 (Government's Exhibit List) and Exhibit 2 (Defendant's Exhibit List). These exhibit lists reflect the following changes:

The government removed from its exhibit list the following exhibits to which the defense had objected: GX 27, GX 33, GX 45, GX 65, GX 120, GX 153, GX 159, GX 169, GX 213, GX 215, GX 308, GX 309, GX 314, GX 330, GX 358, GX 416, GX 513, GX 538, GX 539, GX 662, and GX 673. In addition, the government removed additional exhibits to which the defense had not objected: GX 501, GX 502, GX 507-509, GX 512, GX 514-516, GX 519-520, GX 524, GX 527, GX 533, GX 541-543, and GX 545-546. The government planned to remove four additional exhibits but is maintaining them at the defense's request. The defense withdrew its objections to GX 105 and GX 156.

The defense removed from its exhibit list the following exhibits to which the government had objected: DX 7, DX 10, DX 29, DX 45, DX 72, DX 82, DX 138, DX 144, DX 158, DX 166, DX 185, DX 198, DX 204, DX 223, DX 232, DX 233, DX 264, DX 288, DX 296, DX 304, DX 315, DX 316, DX 321, DX 323, DX 325, DX 328. In addition, the defense removed additional exhibits to which the government had not objected: DX 5, DX 146, DX 210, DX 217, DX 237, DX 298, DX 31. The government withdrew its objections to DX 25, DX 160, DX 172, and DX 336.

B. Stipulations

The parties continue to work together to reach agreement on additional stipulations and will notify the Court promptly if these efforts prove successful.

Respectfully submitted,

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Dated: August 5, 2019

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

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GREGORY B. CRAIG,

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Case No. 1:19-CR-00125 (ABJ)

GOVERNMENT'S EXHIBIT LIST

Exhibit #	Date	Description	Bates Number	Objection
1	12/18/2012	Letter from Hunt to Yaffa	USA-00021397-00021421	No Objection
2	2/6/2013	Letter from Craig to Hunt	USA-00000091-00000142	No Objection
3	4/9/2013	Letter from Hunt to Craig	USA-REL-0304839-0304841	No Objection
4	6/3/2013	Letter from Craig to Hunt	USA-REL-0159226-0159241	No Objection
5	9/5/2013	Letter from Hunt to Craig	USA-REL-0304852-0304853	No Objection
6	9/19/2013	Email; FARA	USA-REL-0201346	No Objection
7	9/20/2013	Email; First draft of a response to FARA	USA-REL-0337507-0337510	No Objection
8	9/24/2013	Draft of Letter to FARA Division in the Department of Justice	USA-REL-0201350 - 0201352	Completeness
9		Document History Report	USA-REL-0237374	Lacks Foundation, Hearsay, FRE 401, FRE 403
10		Document History Report	USA-REL-0237370	Lacks Foundation, Hearsay, FRE 401, FRE 403
11	9/26/2013	Letter from Craig to Hunt	USA-00000090	No Objection
12	10/10/2013	Letter from Craig to Hunt	USA-00000087-00000088	No Objection
13	1/16/2014	Letter from Hunt to Craig	USA-REL-0201303	No Objection

Exhibit #	Date	Description	Bates Number	Objection
14	ND	OMB NO 1124-0001 FORM NSD-1	USA-00021350-00021356	FRE 401, 403
15	ND	OMB NO. 1124-0002 FORM NSD-2	USA-00021357-00021366	FRE 401, 403
16	ND	OMB NO 1124-0006 FORM NDS-3	USA-00021367-00021368	FRE 401, 403
17	ND	OMB NO. 1124-0004 FORM NSD-4	USA-00021369-00021370	FRE 401, 403
18	ND	OMB NO. 1124-0003 FORM NSD-5	USA-00021371-00021372	FRE 401, 403
19	ND	OMB NO. 1124-0005 FORM NSD-6	USA 00021373-00021374	FRE 401, 403
<i>Tabs 20 – 24 intentionally omitted.</i>				
25	2/9/2012	Email; New business	USA-REL-0000409	No Objection
26	2/10/2012	Email; New Business prospect: Ukraine	USA-REL-0341447- 0341448	Hearsay
27		<i>[Exhibit withdrawn]</i>		
28	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157963	No Objection
29	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157981	Completeness
30	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157960- 0157961	No Objection
31	2/13/2012	Email; RE: Yulia Tymoshenko	USA-REL-0157956- 0157957	No Objection
32	2/13/2012	Email; Ukraine - Application of the Foreign Agents Registration Act of 1938 (FARA)	USA-REL-0176754- 0176779	No Objection
33		<i>[Exhibit withdrawn]</i>		
34	2/20/2012	Email; Retainer letter	USA-REL-0000411- 0000422	Completeness
35	2/28/2012	Email; Anything new	USA-REL-0110384	Completeness
36	2/28/2012	Email; RE: Are you free to talk	USA-REL-0000435	No Objection
37	3/1/2012	Email; Re: Retainer letter	USA-REL-0000436	No Objection
38	3/6/2012	Email; Re: Retainer letter	USA-REL-0000450- 0000451	No Objection
39	3/6/2012	Email; Retainer letter and Next Steps	USA-REL-0000447- 0000449	No Objection
40	3/17/2012	Email; RE: Good time to catch up today	USA-REL-0000459	No Objection

Exhibit #	Date	Description	Bates Number	Objection
41	3/19/2012	Email; Re: Money	USA-REL-0000463	No Objection
42	3/20/2012	Email; Re: Dates for trip	USA-REL-0000472-0000474	No Objection
43	3/22/2012	Email; Re: Meeting tomorrow	USA-REL-0008100	No Objection
44	3/23/2012	Calendar; Paul Manafort Mtg	USA-REL-0336965	No Objection
45		<i>[Exhibit withdrawn]</i>		
46	4/5/2012	Document; Notes of meetings	USA-REL0160995	No Objection
47	4/5/2012	Email; Re [] Press Release	USA-REL-0177315-0177316	No Objection
48	4/5/2012	Email; Re [] Press Release	USA-REL-0177311-0177312	No Objection
49	4/5/2012	Email; Re [] Press Release	USA-REL-0177308-0177310	No Objection
50	4/5/2012	Email; Re [] Press Release	USA-REL-0177317-19	No Objection
51	4/5/2012	Email; Re: Got a good report	USA-REL-000647	No Objection
52	4/5/2012	Email; Re: Tomorrow - Friday 4/6	USA-REL-0027690	No Objection
53	4/6/2012	Email; Re: Tomorrow - Friday 4/6	USA-REL-0158092-0158093	No Objection
54	4/7/2012	Email; Re: Tomorrow - Friday 4/6	USA-REL-0027698-0027700	No Objection
55	4/10/2012	Email; Procurator General wants us there	USA-REL-0008265	No Objection
56	4/11/2012	Email; Re:	USA-REL-0158098	No Objection
57	4/11/2012	Email; Re: Kuzmin on New charges against Tymo	USA-REL-0043806-0043811	No Objection
58	4/11/2012	Email; Re: Urgent Problem	USA-REL-0000668-0000671	Completeness
59	4/11/2012	Email; Re: Urgent Problem	USA-REL-0000664	No Objection
60	4/12/2012	Email; Re: Confirmation	USA-REL-0000663-67	No Objection
61	4/13/2012	Email; Re: Ukraine Project	USA-REL-0177816	No Objection
62		<i>Tab intentionally omitted.</i>		
63	4/16/2012	Email; Re: re Ukraine wire	USA-REL-0177876-0177877	FRE 401, FRE 403
64	4/16/2012	Email; FARA issues	USA-REL-0177874-0177875	No Objection
65		<i>[Exhibit withdrawn]</i>		
66	4/17/2012	Email; FARA issues	USA-REL-0046192	No Objection

Exhibit #	Date	Description	Bates Number	Objection
67	4/17/2012	Email; FW: Ukraine - Application of the Foreign Agents Registration Act of 1938 ("FARA") PROPER ATTACHMENTS	USA-REL-0163015-0163041	No Objection
68	4/17/2012	Email; RE: FARA Issues	USA-REL-0045044	No Objection
69	4/17/2012	Email; Re: FARA issues	USA-REL-0113037-0113038	Completeness
70	4/17/2012	Email; Re: FARA issues	USA-REL-0111929-0111930	Completeness
71	4/17/2012	Email; FARA issues	USA-REL-0111932-0111933	No Objection
<i>Tabs 72 - 99 intentionally omitted.</i>				
100	4/19/2012	Email; PR Issues	USA-REL-0168280	Completeness
101	4/23/2012	Email; Ukraine Status Report	USA-REL-0046959-61	No Objection
102	4/27/2012	Email; PR Firms	USA-REL-0047010	No Objection
103	4/30/2012	Email; FW: Ukraine - Application of the Foreign Agents Registration Act of 1938 ("FARA") PROPER ATTACHMENTS	USA-REL-0027382-0027384	No Objection
104	4/30/2012	Email; RE: 1230 at Hay Adams	USA-REL-0000712	No Objection
105	4/30/2012	Email; FW: PR Firms [Redacted]	USA-REL-0000711	No Objection
106	5/1/2012	Email; RE: Confidential: Prospective client	USA-REL-0341095	Completeness
107	5/3/2012	Email; Meeting Notes: 5/2/12	USA-REL-0114889-0114893	No Objection
108	5/3/2012	Email; Re: Action Item	USA-REL-0000730-0000733	No Objection
109	5/3/2012	Email; Investigation of Tymo allegations of "beating"	USA-REL-0114885-0114888	FRE 401, FRE 403
110	5/3/2012	Email; RE: Investigation of Tymo allegations of "beating"	USA-REL-0047088	FRE 401, 403
111	5/3/2012	Email; Resolving Letter Agreement Issue	USA-REL-0000722-0000729	No Objection
112	5/7/2012	Email; PR Update	USA-REL-00047232-00047234	Completeness
113	5/7/2012	Email; RE: Tymo	USA-REL-0047212-13	Completeness

Exhibit #	Date	Description	Bates Number	Objection
114	5/7/2012	Email; RE: Tymo	USA-REL-0027354-56	No Objection
115	5/9/2012	Email; RE:	USA-REL-0027792-93	Completeness, FRE 401, FRE 403
116	5/10/2012	Email; RE: Kiev	USA-REL-0341033-0341036	Completeness
117	5/10/2012	Email; FTI	USA-REL-0000769	Completeness
118	5/11/2012	Email; Confidential: Project Veritas contract	USA-REL-0341125-26	No Objection
119	5/12/2012	Email; Ukraine	USA-REL-0341414-0341415	No Objection
120		<i>[Exhibit withdrawn]</i>		
121	5/15/2012	Email; Tymo -- your plans	USA-REL-0348634-0348637	No Objection
122	5/15/2012	Email; The Ministry of Justice, Government of Ukraine	USA-REL-0158406	No Objection
123	5/18/2012	Email; Project Veritas	USA-REL-0347003-00347004	No Objection
124	5/22/2012	Email; Letter to Mr. Vlasenko and Ms. Tymoshenko delivered	USA-REL-0170204-0170206	No Objection
125	5/22/2012	Email; Re: Hostile US-based blogger	USA-REL-0342221-0342224	FRE 401, FRE 403, Hearsay
126	5/22/2012	Email; Re: Delivery of letter to Vlasenko	USA-REL-0000841-0000842	No Objection
127	5/22/2012	Email; Re: Press statements	USA-REL-0348566-0348570	No Objection
128	5/22/2012	Email; Re: Press statements	USA-REL-0345061-0345066	Completeness
129	5/22/2012	Email; Re: Press statements	USA-REL-0348047-0348052	No Objection
130	5/22/2012	Email; Re: Press statements	USA-REL-0349988-0349994	Completeness
131	5/22/2012	Email; Re: Press statements	USA-REL-0115565-00115568	No Objection
132	5/22/2012	Email; Re: Press statements	USA-REL-0346816	No Objection
133	5/23/2012	Email; Re: Press statements	USA-REL-0115733-0115739	Completeness
<i>Tabs 134 - 148 intentionally omitted.</i>				
149	5/24/2012	Email; FW:	USA-REL-0000876-0000889	Completeness

Exhibit #	Date	Description	Bates Number	Objection
150	5/24/2012	Email; Re: Letter Agreement	USA-REL-0008393	No Objection
151	5/29/2012	Email; Re: Ukraine engagement	USA-REL-0341345-0341348	Completeness
152	5/29/2012	Email; Re: Ukraine engagement	USA-REL-0341349-0341352	No Objection
153		<i>[Exhibit withdrawn]</i>		
154	6/5/2012	Email: RE: Letter	USA-REL-0171488-0171490	No Objection
155	6/6/2012	Email: Ukraine update	USA-REL-0344307	No Objection
156	6/6/2012	Email: Re: getting together [Redacted]	USA-REL-0000890-0000892	No Objection
157	6/7/2012	Email; Tymo - FTI Call	USA-REL-0171740-42	No Objection
158	6/11/2012	Email; Re: Schedule for the Week	USA-REL-0171872-0171873	No Objection
159		<i>[Exhibit withdrawn]</i>		
160	6/14/2012	Email; RE: Project 2	USA-REL-0172187	No Objection
161	6/15/2012	Email; []	USA-REL-0348605-0348613	No Objection
162	6/21/2012	Email: FW: Project Two	USA-REL-0172567	FRE 401, FRE 403
163	6/21/2012	Email: Re: Project Two	USA-REL-0172558-0172559	FRE 401, FRE 403
164	6/21/2012	Email: FW: Application of the Foreign Agents Registration Act of 1928 ("FARA") PROPER ATTACHMENTS	USA-REL-0180790-0180819	No Objection
165	6/22/2012	Email; Re ?????????? 95 ??????????	USA-REL-0000914	FRE 401, FRE 403
166	6/24/2012	Email; Legal Report	UUSA-REL2-0003962	No Objection
167	6/25/2012	Email; RE: Vlasenko	USA-REL-0050383	No Objection
168	6/26/2012	Email: FW: Statute request	USA-REL-0155041-0155101	FRE 401, FRE 403, Completeness
169		<i>[Exhibit withdrawn]</i>		
170	7/2/2012	Email; RE: Tymoschenko	USA-REL-0158609	No Objection
171	7/9/2012	Email; FTI	USA-REL-0051030	No Objection
172	7/10/2012	Email; Re: Tymo Project 2 Meetings	USA-REL-0172966-0172968	FRE 401, FRE 403
173	7/12/2012	Email; PK: Vin Weber, Top Romney Advisor,	USA-REL-0162978-0162980	No Objection

Exhibit #	Date	Description	Bates Number	Objection
		Lobbying for Ukraine Group		
174	7/13/2012	Email; Plan	USA-REL-0350561-0350574	No Objection
175	7/14/2012	Email; FW: Project One Report	USA-REL-0165328-0165329	FRE 401, FRE 403
176	7/14/2012	Email; Project Veritas - Communications Strategy	USA-REL-0351221-235	No Objection
177	7/15/2012	Email; Re: update today	USA-REL-0000919	No Objection
178	7/15/2012	Email; Team Ukraine Status	USA-REL-0124934-0125074	No Objection
179	7/16/2012	Email; Schedule for upcoming Kyiv trip	USA-REL-0165378-0165383	No Objection
180	7/18/2012	Email; PR on Project One	USA-REL-0223827	No Objection
181	7/18/2012	Email; Ukraine Update	USA-REL-0200242	No Objection
182	7/20/2012	Email; Kiev Update	USA-REL-0125726-0125741	No Objection
183	7/25/2012	Email; Re: free to talk	USA-REL-0008582	No Objection
184	7/27/2012	Email; Draft Report	USA-REL-0008596-	No Objection
185	7/27/2012	Email; Re: Draft Report	USA-REL-0008592-0008593	No Objection
186	7/27/2012	Email; Re: info needed for Ukraine	USA-REL-0194847-0194848	No Objection
187	7/27/2012	Email; Changes	USA-REL-0008591	No Objection
188	7/27/2012	Email; Re: Changes	USA-REL-0008589	No Objection
189	7/28/2012	Email; Media Plan	USA-REL-0348576-0348580	No Objection
190	7/29/2012	Email; Report: The Tymoshenko Case	USA-REL-00053856-00054251	No Objection
<i>Tabs 191 - 199 intentionally omitted.</i>				
200	7/30/2012	Email: RE: Language Issues	USA-REL-0000924	Completeness
201	7/31/2012	Email; Re: Conclusions / incarceration	USA-REL-0184297-0184298	Completeness
202	7/31/2012	Email; Re: Conclusions / incarceration	USA-REL-0184266-0184269	No Objection
203	8/1/2012	Email; New Draft	USA-REL-0000927-28	No Objection
204	8/1/2012	Email; RE: Slaterry	USA-REL-0193673-109674	No Objection
205	8/3/2012	Email; Manafort is seeing BG on Wednesday	USA-REL-0136184	Completeness

Exhibit #	Date	Description	Bates Number	Objection
206	8/3/2012	Email; Project One Report - The Tymoshenko Case	USA-REL-0009382-0009677	No Objection
207	8/5/2012	Email; Draft plan	USA-REL-0351144-0351191	No Objection
208	8/7/2012	Email; Tymo report - action points and questions	USA-REL-0136194	No Objection
209	8/9/2012	Email; Kyiv Post Editorial: Skadden Sting	USA-REL-0176355	Completeness
210	8/9/2012	Email; RE: Kyiv Post Editorial: Skadden Stink	USA-REL-0136202-0136203	No Objection
211	8/10/2012	Email; Ukraine Payment	USA-REL-0184954	No Objection
212	8/13/2012	Email; Ukraine disclosure idea	USA-REL-0185184	No Objection
213		<i>[Exhibit withdrawn]</i>		
214	8/14/2012	Email: Re: VP or MOJ	USA-REL-0001239	No Objection
215		<i>[Exhibit withdrawn]</i>		
216	8/22/2012	Email; Here is the letter re fees	USA-REL-0009993-0009995	No Objection
217	8/22/2012	Email; Re: Here is the letter re fees	USA-REL-0001271-0001273	MIL Procurement
218	8/22/2012	Email; Re: Here is the letter re fees	USA-REL-0009991-92	MIL Procurement
219	8/23/2012	Email; Letter to MOJ	USA-REL-0005669-0005670	MIL Procurement
220	8/24/2012	Email; Fw: Update	USA-REL-0342746	No Objection
221	8/28/2012	Email; FW:	USA-REL-0143608-0143625	No Objection
222	8/29/2012	Email; Re: Ukraine	USA-REL-0343574-034575	FRE 401, FRE 403
223	8/29/2012	Email; Time to talk re. MOJ report?	USA-REL-0187258-0187259	No Objection
224	8/30/2012	Email; Re: Work Schedule to finalize report	USA-REL-0144020-0144022	No Objection
225	8/30/2012	Email; Re: Work Schedule to finalize report	USA-REL-0006015-0006016	No Objection
226	8/30/2012	Email; Re: Project 2	USA-REL-0144052-0144053	No Objection
227	8/30/2012	Email; Memo for Manafort	USA-REL-0344875-91	No Objection
228	9/3/2012	Manafort to Craig; subj: URGENT: Actions this week - Wrapping up	USA-REL-0006051-53	No Objection
229	9/5/2012	Email; Ukraine	USA-REL-0350232	No Objection

Exhibit #	Date	Description	Bates Number	Objection
230	9/10/2012	Email; Re:	USA-REL-0006093	No Objection
231	9/11/2012	Email; Document	USA-REL-0342368	No Objection
232	9/12/2012	Email; Updates	USA-REL-0348008	No Objection
233	9/12/2012	Email; MY COMMENTS	USA-REL-0344423-33	No Objection
234	9/17/2012	Email; Document	USA-REL-0345529-0345831	No Objection
<i>Tabs 235 - 249 intentionally omitted.</i>				
250	9/13/2012	Email; FTI PLAN FOR RELEASE	USA-REL-0007062-66	No Objection
251	9/18/2012	Email; meeting today	USA-REL-0007075	Completeness
252	9/19/2012	Email; FW: Here	USA-REL-0148186-0148191	No Objection
253	9/21/2012	Email; meeting on Sunday	USA-REL-0350747-73	Hearsay
254	9/23/2012	Email; Documents	USA-REL-0019487-0019559	No Objection
255	9/23/2012	Email; Points coming out of today's meeting in NY	USA-REL-0082763	No Objection
256	9/23/2012	Email; Meeting tomorrow morning	USA-REL-0029796	Hearsay, Completeness
257	9/23/2012	Email; Meeting tomorrow morning	USA-REL-0344296-97	No Objection
258	9/24/2012	Email; Re: Notes from yesterday	USA-REL-0347958-60	No Objection
259	9/24/2012	Email; Ukraine	USA-REL-0149306	No Objection
260	9/24/2012	Email; Question re Release Planning in Ukraine	USA-REL-0029800	Completeness
261	9/24/2012	Email; Backgrounding journalists	USA-REL-0019650	No Objection
262	9/24/2012	Email; Re: Question re Release Planning in Ukraine	USA-REL-0029798-99	No Objection
263	9/24/2012	Email; Re: Backgrounding Journalists	USA-REL-0019649	No Objection
264	9/24/2012	Email; Re: Backgrounding Journalists	USA-REL-0019648	No Objection
264A	9/24/2012	Email; Re: Backgrounding Journalists	USA-REL-0007498	Hearsay
265	9/24/2012	Email; Two Problems	USA-REL-0149233	Completeness
266	9/24/2012	Email; Re: Two problems	USA-REL-0150940	No Objection
267	9/25/2012	Email; Re: Draft messaging	USA-REL-0007508-0007510	No Objection

Exhibit #	Date	Description	Bates Number	Objection
268	9/25/2012	Email; FW: Email from Greg Craig	USA-REL-0149958-0149959	No Objection
269	9/25/2012	Email; FW Email from Greg Craig	USA-REL-0150943	No Objection
270	9/25/2012	Email; Re: Meeting and Items	USA-REL-0342809	No Objection
271		<i>Tab intentionally omitted.</i>		
272	9/25/2012	Email; Re: Point 5	USA-REL-0346747-50	No Objection
273	9/26/2012	Email; Meeting Agenda	USA-0016371-0016372	Completeness
274	9/27/2012	Email; PJM Outline of Findings	USA-REL-0346213-0346216	Hearsay
275	9/28/2012	Email; Greg	USA-REL-0344436	No Objection
276	9/30/2012	Email; Re: Document	USA-REL-0341948-0341958	No Objection
277	9/30/2012	Email; Wave 2	USA-REL-0342832	No Objection
278	10/1/2012	Calendar; ECFMU/Ukraine Call with attachment DC Consultants Plan 9-28-1012.xlsx	USA-REL2-0017111-12	No Objection
279	10/2/2012	Email; Fw: another set of comments	USA-REL-0151623-30	No Objection
280	10/2/2012	Email; Re: Master Grid	USA-REL-0344302-0344306	No Objection
281	10/2/2012	Email; Matrix - Actions	USA-REL-0347947-0347948	No Objection
300	10/2/2012	Email; David Sanger (NY Times)	USA-REL-0193917	No Objection
301	10/2/2012	Email;	USA-REL-0193916	No Objection
302	10/2/2012	Email; Re: Ukraine	USA-REL-0160104	No Objection
303	10/3/2012	Email; Fw: Ukraine	USA-REL-0193922	No Objection
304	10/3/2012	Email; Fw: UKraine	USA-REL-0193921	No Objection
305	10/3/2012	Email; Fwd: MCG	USA-REL-0344042-0344046	No Objection
306	10/3/2012	Document; Skadden Report Roll Out Plan by Mercury/Clark & Weinstock	USAODC-000003-000005	Lack of Foundation, FRE 401, FRE 403, Hearsay
307	10/3/2012	Email; Re: Call number for [] roundtable at 3pm 202-296-9312	USA-REL-0191404	No Objection
308		<i>[Exhibit withdrawn]</i>		
309		<i>[Exhibit withdrawn]</i>		

Exhibit #	Date	Description	Bates Number	Objection
310	11/19/2012	Email; Your final issues	USA-REL-0007604	No Objection
311	11/20/2012	Email; Timing of Delivery	USA-REL-0007606	MIL Procurement
312	11/26/2012	Email; Re: Report	USA-REL-0366346- 0366441	No Objection
313	11/28/2012	Email; Greg's Memo	USA-REL-0020062- 0020067	No Objection
314		<i>[Exhibit withdrawn]</i>		
315	11/30/2012	Email; The Report	USA-REL-0020091	No Objection
316	12/6/2012	Email; Project Veritas	USA-REL-0029942	No Objection
317	12/6/2012	Email; Updated docs	USA-REL-0366688- 0366781	No Objection
318	12/6/2012	Email; Docs	USA-REL-0366782	No Objection
319	12/6/2012	Email; Jonathan Hawker - 011 44 7979 907000	USA-REL-0193987	No Objection
320	12/6/2012	Email; report release date	USA-REL-0191850	No Objection
321	12/6/2012	Email; report release date	USA-REL-0038263	No Objection
322	12/6/2012	Email; Phase One media	USA-REL-0366783- 0366784	No Objection
323	12/6/2012	Email; Updated docs	USA-REL-0365631	No Objection
324	12/7/2012	Email; [blank]	USA-REL-0038268	Hearsay, FRE 401, FRE 403
325	12/7/2012	Email; Call with Vin Weber today	USA-REL-0193988	No Objection
326	12/7/2012	Email; Did Rick Gates reach you?	USA-REL-0159064	FRE 401, FRE 403
327	12/10/2012	Email; Master Grid	USA-REL-0366916 + attachment	No Objection
328	12/10/2012	Email; Journalist contact details needed	USA-REL-0365739	No Objection
329	12/11/2012	Email; In reception	USA-REL-0366918	No Objection
330		<i>[Exhibit withdrawn]</i>		
331	12/11/2012	Email; Update	USA-REL-0020098	No Objection
332	12/11/2012	Email; Greg Craig	USA-REL-0029969	No Objection
<i>Tabs 333 - 349 intentionally omitted.</i>				
350	12/11/2012	Email; Ukraine	USA-REL-0160113	No Objection
351	12/11/2012	Email; Ukraine	USA-REL-0029972	No Objection
352	12/11/2012	Email; Ukraine	USA-REL-0160111- 0160112	No Objection
353	12/11/2012	Email; Ukraine	USA-REL-0159068- 0159069	No Objection

Exhibit #	Date	Description	Bates Number	Objection
354	12/11/2012	Email; Ukraine	USA-REL-0160114-0160115	No Objection
355	12/11/2012	Email; Report on the Tymoshenko case	USA-REL-0161002	No Objection
356	12/11/2012	Email; Ukraine	USA-REL-0159066-0159067	No Objection
357	12/11/2012	Email; Electronic Delivery	USA-REL-0159065	No Objection
358		<i>[Exhibit withdrawn]</i>		
359	12/11/2012	Email; Sanger conversation	USA-REL-0160998	No Objection
360	12/11/2012	Email; Electronic delivery	USA-REL-0029971	No Objection
361	12/11/2012	Email; Re: Warsaw	USA-REL-0038299	No Objection
362	12/11/2012	Email; Report on the Tymoshenko case	USA-REL-0194866	No Objection
363	12/12/2012	Email; Ukraine	USA-REL-0366783-0366784	No Objection
364	12/12/2012	Email; Hawker to Craig; subj: First journalist	USA-REL-0193997	No Objection
365	12/12/2012	Email; Gianotti to Gates et al; subj: Greg's Details for ANSA	USA-REL-0365859	FRE 401, FRE 403
366	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0160123	No Objection
367	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0160124	No Objection
368	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0194880	No Objection
369	12/12/2012	Email; On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0152360-0152663	No Objection
370	12/12/2012	Email; Sanger received the pdf of the report	USA-REL-0194887	No Objection
371	12/12/2012	Email; Daily Telegraph - quotes approval - pls confirm receipt	USA-REL-0194883	No Objection
372	12/12/2012	Email; Ukraine story - please confirm receipt	USA-REL-0367342-0367347	No Objection
373	12/12/2012	Email; Report on the Tymoshenko case	USA-REL-0194874-0194875	No Objection
374	12/12/2012	Email; Daily Telegraph - quotes approval - pls confirm receipt	USA-REL-0191884-0191886	No Objection
375	12/12/2012	Email; Times	USA-REL-0029981	No Objection

Exhibit #	Date	Description	Bates Number	Objection
376	12/12/2012	Email; hello and questions, from NYT Moscow	USA-REL-0160119-0160120	No Objection
377	12/12/2012	Email; Ukraine	USA-REL-0161012	No Objection
378	12/12/2012	Email; Ukraine	USA-REL-0161000	No Objection
379	12/12/2012	Email; quote re political motivation	USA-REL-0161011	No Objection
380	12/12/2012	Email; Release time	USA-REL-0161010	No Objection
381	12/13/2012	Email; Heads up on Ukraine	USA-REL-0201013	No Objection
382	12/13/2012	Email; Press contact for Ukraine/MoJ report	USA-REL-0194003	No Objection
383	12/13/2012	Email; Report Coverage	USA-REL-0973088-0973090	No Objection
384	12/13/2012	Email; Report Coverage	USA-REL-0367672-0367676	No Objection
385	12/13/2012	Email; Press contact for Ukraine/MoJ report	USA-REL-0106944-0106945	No Objection
386	12/13/2012	Email; URGENT - corruption allegation	USA-REL-0029988-0029989	No Objection
387	12/13/2012	Email; Legal Times / National Law Journal	USA-REL-0160532	No Objection
388	12/13/2012	Email; Media Inquiry re MOJ FW: Kommersant Ukraine	USA-REL-0030309-0030310	No Objection
389	12/13/2012	Email; Copy of Tymoshenko report and interview?	USA-REL-0194993	No Objection
390	12/13/2012	Email; On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0153606	No Objection
391	12/13/2012	Email; Legal Times	USA-REL-0160133	No Objection
392	12/13/2012	Email; Media Inquiry re MOJ FW: Kommersant Ukraine	USA-REL-0030300-0030302	No Objection
393	12/13/2012	Email; Well Done	USA-REL-0193998	Hearsay, Completeness
394	12/13/2012	Email; On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0160125-0160127	No Objection
395	12/13/2012	Email; Ukraine Report in the Press	USA-REL-0191899	No Objection
396	12/13/2012	Email; Well Done	USA-REL-0020151	Hearsay

Exhibit #	Date	Description	Bates Number	Objection
397	12/13/2012	Email; The Tymoshenko Case	USA-REL-0029994	No Objection
398	12/14/2012	Email; Former Ukrainian leader's trial was fair but flawed	USA-REL-0160459-0160460	No Objection
399	12/14/2012	Tymoshenko Report - NLJ	USA-REL-0195644	No Objection
400	12/14/2012	Email; Matthew Huisman should be calling Greg shortly	USA-REL-0195662	No Objection
401	12/14/2012	Email; Draft for your comments	USA-REL-0160442-0160443	No Objection
402	12/15/2012	Email; SA Report - Media Update	USA-REL-0007945-0007948	Hearsay, FRE 401, FRE 403
403	12/13/2012	<i>New York Times</i> article	USAO-00022275, 77	No Objection
<i>Tabs 404 - 409 intentionally omitted.</i>				
410	12/22/2012	Email; Subject: Request for information from DOJ re Tymoshenko trial review	USA-REL-020130	No Objection
411	1/4/2013	Email; Subject: Draft answers to (3) and (4)	USA-REL-0304585-0304586	No Objection
412	1/4/2013	Email; Subject: Re: Request for informaiton from DOJ re Tymoshenko trial review	USA-REL-0304587-0304589	No Objection
413	1/5/2013	Email; Subject: Re: Request for informaiton from DOJ re Tymoshenko trial review	USA-REL-0304597-0304599	No Objection
414	1/7/2013	Email; Not so fast	USA-REL-0201043	No Objection
415	1/14/2013	Email; Subject: Revision	USA-REL-0304626-0304627	No Objection
416		<i>[Exhibit withdrawn]</i>		
417	1/16/2013	Email; Subject: Re: Ukraine: See attached response to DOJ for your review	USA-REL-0304633(email only)	No Objection
418	2/6/2013	Email; Subject: Re: FARA Response	USA-REL-0304655	No Objection
419	2/7/2013	Email; Subject: Re: Letter from Gregory B. Craig	USA-REL-0201123-0201124	No Objection

Exhibit #	Date	Description	Bates Number	Objection
420	2/7/2013	Email; Subject: FW: Greg's letter to Justice	USA-REL-0201127-0201179	No Objection
421	3/13/2013	Email; Subject: RE: News article re contracts	USA-REL-0201233-35	MIL Procurement, Hearsay
422	4/4/2013	Email; Subject: Responding to FARA letter re Ukraine	USA-REL-0304734	No Objection
425	4/15/2013	Email; Subject: RE: Are you here?	USA-REL-0201242	No Objection
426	4/22/2013	Email; Subject: RE: News articles about Ukraine Report	USA-REL-0155404-0155409	No Objection
427	4/29/2013	Email; Subject: Draft response to FARA inquiry	USA-REL-0304736-0304737	No Objection
428	5/1/2013	Email; Subject: Next draft-with some embellishments	USA-REL-0304738-0304740	No Objection
429	5/1/2013	Email; Tweaks	USA-REL-0340523-0340524	No Objection
430	5/1/2013	Email; Subject: please put in final form for my signature	USA-REL-0339232-0339235	No Objection
431	5/15/2013	Email; Subject: updated response to FARA	USA-REL-0304755-0304758	No Objection
432	5/17/2013	Email; Re: Can we talk?	USA-REL-0159211	No Objection
433	5/20/2013	Email; Subject: FW: updated response to FARA	USA-REL-0304778-0304781	No Objection
434	5/20/2013	Email; Subject: FW: Next draft -- with some embellishments	USA-REL-0304775-0304777	No Objection
435	5/20/2013	Email; Subject: Change-Pro Redline - Response to FARA Inquiry 1249781 v1. and Response to Inquiry (revised) 1248782 v1.	USA-REL-0304770-0304774	No Objection
436	5/20/2013	Email; Subject: latest document	USA-REL-0339236-0339237	No Objection
437	5/20/2013	Email; Subject: Change-Pro Redline - Respose to Inquiry (revised) 1249782 v. 1. and Revised Response (2nd Round) 1249802) v.1	USA-REL-0337011-0337015	No Objection

Exhibit #	Date	Description	Bates Number	Objection
438	5/20/2012	Email; Subject: Change-Pro Redline - Response to FARA Inquiry 1249781 v1. Revised Response (2nd Round) 1249802 v1	USA-REL-0337006-0337010	No Objection
439	5/20/2012	Email; Subject: Fara Response	USA-REL-0304759-0304763	No Objection
440	5/20/2012	Email; Subject: Change-Pro Redline - Response to FARA Inquiry 1249781 v1. and Response to FARA Inquiry (most current version) 1249835 v1.	USA-REL-0337001-0337005	No Objection
441	5/22/2013	Email; Re: Call	USA-REL-0159212	No Objection
442	5/28/2012	Email; Subject: FW: Scanned Documents	USA-REL-0304796-0304799	No Objection
443	5/28/2013	Email; Subject: RE: Scanned Documents	USA-REL-0304800	No Objection
444	5/28/2013	Email; Subject: FW: Scanned Documents	USA-REL-0304801	No Objection
445	5/29/2013	Email; Subject: FW: Letter to DOJ	USA-REL-0304827-0304830	No Objection
446	5/29/2013	Email; Subject: RE: Letter to DOJ	USA-REL-0304822	No Objection
447	5/29/2013	Email; Subject: RE: Letter to DOJ	USA-REL-0304821	No Objection
448	5/29/2013	Email; Subject: Fw: Letter to DOJ	USA-REL-0304812-0304815	No Objection
449	5/29/2013	Email; Just got home	USA-REL-0194053	FRE 401, FRE 403
450	5/31/2013	Email; Subject: FW: FARA Response	USA-REL-0304846-0304847	No Objection
451	6/3/2013	Email; put in final form	USA-REL-0340518-0340522	No Objection
452		Document History Report	UAS-REL-0337527	Lacks Foundation, Hearsay, FRE 401, FRE 403
453		Document History Report	USA-REL-0337530	Lacks Foundation, Hearsay, FRE 401, FRE 403
454		Document History Report	USA-REL-0337532	Lacks Foundation,

Exhibit #	Date	Description	Bates Number	Objection
				Hearsay, FRE 401, FRE 403
455		Document History Report	USA-REL-0337536-0337537	Lacks Foundation, Hearsay, FRE 401, FRE 403
456		Document History Report	USA-REL-0337539	Lacks Foundation, Hearsay, FRE 401, FRE 403
457		Document History Report	USA-REL-0337527	Lacks Foundation, Hearsay, FRE 401, FRE 403
<i>Tabs 458 - 459 intentionally omitted.</i>				
460	9/11/2013	Email; Subject: FARA reply	USA-REL-0304851-0304853	No Objection
461	9/11/2013	Email; Subject: FW: FARA Reply	USA-REL-0201243-0201245	No Objection
462	9/12/2013	Email; Subject: Fwd: FARA Reply	USA-REL-0304859	No Objection
463	9/12/2013	Email; Subject: Re: FARA Reply	USA-REL-0304854	No Objection
464	9/19/2013	Email; Subject: RE: FARA reply	USA-REL-0304864	No Objection
465		[intentionally blank]		No Objection
466	9/19/2013	Email; Subject: FW: FARA	USA-REL-0337016	No Objection
467		[intentionally blank]		No Objection
468	9/20/2013	Email; Subject: FW: First draft of a response to FARA	USA-REL-0304865-0304868	No Objection
469		[intentionally blank]		No Objection
470	9/24/2013	Draft Response to FARA	USA-REL-0201350-0201352	No Objection
471	9/25/2013	Email; Subject: Re: Alex Mudd - DOJ - 202-233-0777	USA-REL-0304870	No Objection
472	10/8/2013	Email; Subject: FW: FARA letter	USA-REL-0303713-0303715	No Objection
473	10/8/2013	Email; Subject: FW: FARA letter	USA-REL-0303717	No Objection

Exhibit #	Date	Description	Bates Number	Objection
474	10/10/2013	Email; Subject: RE: One page FARA letter	GBC 001	No Objection
475	10/15/2013	Email; Subject: FW: On Behalf of Greg Craig - The Tymoshenko Case	USA-REL-0160840-0160841	No Objection
476	10/15/2013	Email; Subject: FW: FINAL letter to H Hunt re FARA	USA-REL-0201299-0201301	No Objection
477	11/5/2013	Skadden bill for services rendered through September 30, 2013	USA-REL-0000215-0000216	No Objection
478	11/21/2013	Skadden bill for services rendered through October 31, 2013	USA-REL0000217-0000219	No Objection
479	Multiple	Skadden Client Escrow Account # 15662391 for Douglas E. Schoen NYC, LLC	USA-REL-0000231-0000263	No Objection
480	1/27/2014	Email; Subject: FW: FARA letter from DOJ	USA-REL-0303825-0303826	No Objection
<i>Tabs 481 - 499 intentionally omitted.</i>				
		HARD COPY DOCUMENTS		
500	ND	Multi-page document with header: Project Veritas Communications Strategy	USA-REL-0339091-0339104	No Objection
501		<i>[Exhibit withdrawn]</i>		
502		<i>[Exhibit withdrawn]</i>		
503	7/27/2012	Memorandum from PJM to SL; Subj: SA Report - Media Plan	USA-REL-0337749-0337765	No Objection
504	8/7/2012	Email; Van der Zwaan to Craig; Subj: Tymo report - action points and questions	USA-REL-0339014-0339015	No Objection
505	8/30/2012	Email; Hawker to kk22314@gmail.com; Subj: Confidential: Report and the media	USA-REL-0339016	No Objection
506	12/12/2012	Article; Failings Found in Trial of Ukrainian Ex-	USA-REL-0339017-0339019	No Objection

Exhibit #	Date	Description	Bates Number	Objection
		Premier, The New York Times		
507		[Exhibit withdrawn]		
508		[Exhibit withdrawn]		
509		[Exhibit withdrawn]		
510	12/13/2012	Article; Ukraine lawmakers brawl; report finds Tymoshenko trial flawed	USA-REL-0339165	No Objection
511		[Exhibit withdrawn]		
512		[Exhibit withdrawn]		
513		[Exhibit withdrawn]		
514		[Exhibit withdrawn]		
515		[Exhibit withdrawn]		
516		[Exhibit withdrawn]		
517	ND	One-page document with header: Response to April 9, 2013 Letter from National Security Division, US Department of Justice	USA-REL-0339029	No Objection
518	5/20/2013	One-page document with header: Response to April 9, 2013 Letter from National Security Division, US Department of Justice	USA-REL-0339030-0339033	No Objection
519		[Exhibit withdrawn]		
520		[Exhibit withdrawn]		
521	9/24/2013	Draft of Letter to FARA Division in the Department of Justice	USA-REL-0339059-0339061	No Objection
522	10/8/2013	Printout from website, www.fara.gov	USA-REL-0339169-0339177	No Objection
523	10/8/2013	Printout from website, www.fara.gov	USA-REL-0339178-0339179	No Objection
524		[Exhibit withdrawn]		
525	3/28/2012	Skadden New Client or Business Unit Memorandum, signed by Gregory Craig	USA-REL-0338196-0338201	No Objection

Exhibit #	Date	Description	Bates Number	Objection
526	4/3/2012	Itinerary / DC - NYC, April 3 - 9, 2012	USA-REL-0339155-0339156	FRE 401, FRE 403
527		<i>[Exhibit withdrawn]</i>		
528	4/10/2012	Letter from Craig to Ministry of Justice; Subj: Retainer Memorandum	USA-REL-0338963-0338969	FRE 401, FRE 403, Hearsay, Foundation
529	ND	Two-page note on stationery of Intercontinental Hotel, Ukraine	USA-REL-0338918-0338919	No Objection
530	ND	One-page note on stationery of Hyatt Regency Kyiv	USA-REL-0338406	No Objection
531	ND	One-page of handwritten notes with header: Manafort telcon	USA-REL-0338904	No Objection
532	4/16/2012	Three-page document with header: Themes for Opening Statement	USA-REL-0338979-0338981	No Objection
533		<i>[Exhibit withdrawn]</i>		
534	4/30/2012	Project Kyiv: Status Report	USA-REL-0338982	No Objection
535	5/2/2012	Invitation to team call for Skadden personnel	USA-REL-0338983	FRE 401, FRE 403
536	9/8/2012	One-page of handwritten notes with header Telcon w/ Vlasenko	USA-REL-0338913	No Objection
537A	8/3/2012	Multi-page document; Comments on the Report and handwritten comments	USA-REL-0027599-0027605	No Objection
537B	ND	Comments on the Report and handwritten comments	USA-REL-0027606	No Objection
537C	9/11/2012	Multi-page document; Comments on the Report and handwritten comments	USA-REL-0027607-08	No Objection
538		<i>[Exhibit withdrawn]</i>		
539		<i>[Exhibit withdrawn]</i>		
540	ND	Multi-page document with cover sheet entry: Comments from OGP + Oval Office	USA-REL-0338933-0338948	Completeness
541		<i>[Exhibit withdrawn]</i>		

Exhibit #	Date	Description	Bates Number	Objection
542		<i>[Exhibit withdrawn]</i>		
543		<i>[Exhibit withdrawn]</i>		
544	ND	Multi-page document addressed to "Greg" re: changes requested in the memo that you received last week	USA-REL-0339124-0339127	No Objection
545		<i>[Exhibit withdrawn]</i>		
546		<i>[Exhibit withdrawn]</i>		
547	4/12/2012	Bank Record from Marfin Laiki Bank	USA-REL-0337809	FRE 401, FRE 403
548	ND	Multi-page document re: July 16, 2012, Letter from Craig to Ministry of Justice of Ukraine	USA-REL-0237377-0237382	MIL Procurement
549	ND	Collection of documents re: Backup bill to MOJ-Ukraine	USA-REL-0237383-0237409	MIL Procurement
550	4/22/2013	Collection of documents re: Payment from Ukraine	USA-REL-0337768-0337780	MIL Procurement
<i>Tabs 551 - 559 intentionally omitted.</i>				
		FINANCIAL DOCUMENTS		
560	3/20/2012	Check from Douglas E. Schoen NYC LLC payable to Skadden Arps in amount of \$150,000	USA-REL-0000220	No Objection
561	4/19/2012	Transaction Detail Advice Inquiry	USA-REL-0000223	No Objection
562	5/2/2012	Skadden bill for services rendered rendered through March 2012	USA-REL-0000121-0000123	No Objection
563	5/18/2012	Skadden bill for services rendered through April 30, 2012	USA-REL-0000124-0000134	No Objection
564	5/20/2012	Transaction Detail Advice Inquiry	USA-REL-0000224	No Objection
565	5/22/2012	Email; Letter to Vlasenko and Ms. Tymoshenko delivered	USA-REL-0170204-0170206	No Objection
566	5/26/2012	Email; Tymoshenko case	USA-REL-0049961-0049962	Completeness

Exhibit #	Date	Description	Bates Number	Objection
567	5/28/2012	Email; Draft response to Vlasenko's email	USA-REL-0049945-0049947	Completeness
568	6/22/2012	Email; [blank]	USA-REL-0180870-0180872	No Objection
569	6/22/2012	Email; Lavrinovich hired Skadden for less than 13 000 USD	USA-REL-0180868	Hearsay, FRE 401, FRE 403
570	6/22/2012	Email; RAPS.com: U.S. attorneys in ECHR under Tymoshenko case to cost Ukraine \$12,5	USA-REL-0000915	FRE 401, FRE 403
571	6/22/2012	Email; Heads up	USA-REL-0008538	No Objection
572	6/22/2012	Email; [cyrillic]	USA-REL-0000913	FRE 401, FRE 403
573	6/26/2012	Skadden bill for services rendered through May 31, 2012	USA-REL-0000135-0000152	No Objection
574	7/13/2012	Transaction Detail Advice Inquiry	USA-REL-0000225	No Objection
575	7/24/2012	Skadden bill for services rendered through June 30, 2012	USA-REL-0000153-0000172	No Objection
576	8/9/2012	Email; Kyiv Post Editorial: Skadden Stink	USA-REL-0136202	No Objection
577	8/9/2012	Email; Kyiv Post Editorial: Skadden Stink	USA-REL-0176348-0176350	Completeness
578	8/10/2012	Email; Update	USA-REL-0001233	No Objection
579	8/10/2012	Email; Ukraine payment	USA-REL-0185163	No Objection
580	8/13/2012	Email; this mornin	USA-REL-0001236	No Objection
581	8/15/2012	Email; updates	USA-REL-0001247-0001248	MIL Procurement
582	8/15/2012	Email; Procedure for Supplemental Payments	USA-REL-0001246	MIL Procurement
583	8/16/2012	Email; updates	USA-REL-0001253-0001255	MIL Procurement
584	8/20/2012	Skadden bill for services rendered through July 31, 2012	USA-REL-0000173-0000189	No Objection
585	8/20/2012	Email; Letter to MOJ	USA-REL-0001265	MIL Procurement
586	8/22/2012	Letter; Outstanding Balance Due	USA-REL-0000190-0000191	MIL Procurement
587	8/23/2012	Email; SK Letter to MOJ.pdf	USA-REL-0005669	MIL Procurement

Exhibit #	Date	Description	Bates Number	Objection
588	11/2/2012	Skadden bill for services rendered through August 31, 2012	USA-REL-0000192-0000198	No Objection
589	11/2/2012	Email; Ukraine	USA-REL-0193953	No Objection
590	12/21/2012	Email; Quick Meeting	USA-REL-0159075	MIL Procurement
591	12/26/2012	Email; CATCH UP	USA-REL-0194010	MIL Procurement
592	12/28/2012	Email; CATCH UP	USSA-REL-0159078-0159079	MIL Procurement
593	1/4/2013	Letter; Invoice for services rendered through January 4, 2013	USA-REL-0339263-0339272	No Objection
594	1/8/2013	Email; Meeting Tomorrow	USA-REL-0020240	MIL Procurement
595	2/5/2013	Email; Paperwork	USA-REL-0020244	MIL Procurement
596	2/8/2013	Email; Question from MOJ	USA-REL-0007981-0007987	MIL Procurement; Completeness
597	2/8/2013	Email; Question from MOJ	USA-REL-0107944-0107945	MIL Procurement
598	2/15/2013	Email; New Contract	USA-REL-0107995-0107997	MIL Procurement
599	2/19/2013	Email; Comments on MOJ contract	USA-REL-0195961-0195962	MIL Procurement; Completeness
600	2/19/2013	Email; Meeting on Wednesday	USA-REL-0020324-0020331	MIL Procurement
601	2/20/2013	Skadden bill for services rendered from September 1, 2012 through December 31, 2012	USA-REL-0000199-0000208	No Objection
602	2/25/2013	Email; Skadden EL	USA-REL-0303503-0303511	MIL Procurement
603	2/25/2013	Email; Skadden EL	USA-REL-0196056	MIL Procurement; Completeness
604	2/26/2013	Email; The new agreement	USA-REL-0027444-0027445	MIL Procurement
605	3/13/2013	Email; congratulations	USA-REL-0196573	MIL Procurement
606	3/13/2013	Email; Inquiries re Ukraine contract	USA-REL-0196574	MIL Procurement

Exhibit #	Date	Description	Bates Number	Objection
607	3/14/2013	Email; MOJ EL and Skadden EL	USA-REL-0196587-USA-REL-0196600	No Objection
608	3/19/2013	Email; Ukraine acctg	USA-REL-0196659	MIL Procurement
609	3/20/2013	Email; Ukraine accounting	USA-REL-0196660	MIL Procurement; Completeness
610		[intentionally blank]		
611	3/25/2013	Email; final bill to Ukraine	USA-REL-0155401	MIL Procurement
612	4/12/2013	Email; Docs	USA-REL-0236825-0236828	MIL Procurement
613	4/23/2013	Email; Table Estimate	USA-REL-0197078-0197081	MIL Procurement
614	6/24/2013	Skadden bill for services rendered through June 24, 2012	USA-REL-0000210-0000213	No Objection
615	8/1/2013	Skadden bill for services recorded through July 31, 2013	USA-REL-0000214	No Objection
616	11/5/2013	Skadden bill for services rendered through September 30, 2013	USA-REL-0000215-0000216	No Objection
617	11/21/2013	Skadden bill for services rendered through October 31, 2013	USA-REL-0000217-0000219	No Objection
618	Multiple	Skadden Client Escrow Account # 15662391 for Douglas E. Schoen NYC, LLC	USA-REL-0000231-0000263	No Objection
619	6/14/2017	Letter; Liquidation, Wire Transfer and Account Closing	USA-REL-0000228	No Objection
<i>Tabs 620 - 624 intentionally omitted.</i>				
625	2/23/2018	Document; Gates Plea Agreement	USA-0020755	No Objection
626	2/23/2018	Document; Gates Statement of Offense	USA-0020756-763	No Objection
<i>Tabs 627 - 649 intentionally omitted.</i>				

Exhibit #	Date	Description	Bates Number	Objection
		PHOTOGRAPHS		
650		Ken Gross	USA-00022232	F.R.E. 401; F.R.E. 403; Lacks foundation
651		Greg Craig	USA-00022228	F.R.E. 401; F.R.E. 403; Lacks foundation
652		Cliff Sloan	USA-00022229	F.R.E. 401; F.R.E. 403; Lacks foundation
653		Michael Loucks	USA-00022235	F.R.E. 401; F.R.E. 403; Lacks foundation
654		Matt Cowie	USA-00022236	F.R.E. 401; F.R.E. 403; Lacks foundation
655		Alex Van Der Zwaan	USA-00022234	F.R.E. 401; F.R.E. 403; Lacks foundation
656		Alex Haskell	USA-00022230	F.R.E. 401; F.R.E. 403; Lacks foundation
657		Allon Kedem	USA-00022231	F.R.E. 401; F.R.E. 403; Lacks foundation
658		[intentionally blank]		F.R.E. 401; F.R.E. 403; Lacks foundation
659		Sergiy Vlasenko	USA-00022225	F.R.E. 401; F.R.E. 403; Lacks foundation
660		Paul Manafort	USA-00022226	F.R.E. 401; F.R.E. 403; Lacks foundation
661		Rick Gates	USA-00022227	F.R.E. 401; F.R.E. 403; Lacks foundation
662		<i>[Exhibit withdrawn]</i>		
663		Rinat Kuzmin	USA-00022222	F.R.E. 401; F.R.E. 403; Lacks foundation
664		Doug Schoen	USA-00022224	F.R.E. 401; F.R.E. 403; Lacks foundation

Exhibit #	Date	Description	Bates Number	Objection
665		Viktor Pinchuk	USA-00022223	F.R.E. 401; F.R.E. 403; Lacks foundation
666		Segiy Lyovovhkin	USA-00022221	F.R.E. 401; F.R.E. 403; Lacks foundation
667		Viktor Yanukovych	USA-00022218	F.R.E. 401; F.R.E. 403; Lacks foundation
668		Yulia Tymoshenko	USA-00022216	F.R.E. 401; F.R.E. 403; Lacks foundation
669		Oleksandr Lavrinovich	USA-00022220	F.R.E. 401; F.R.E. 403; Lacks foundation
670		Viktor Pshonka	USA-00022219	F.R.E. 401; F.R.E. 403; Lacks foundation
671		Lawrence Spiegel	USA-00022233	F.R.E. 401; F.R.E. 403; Lacks foundation
672		Jonathan Hawker	USA-00022237	F.R.E. 401; F.R.E. 403; Lacks foundation
673		<i>[Exhibit withdrawn]</i>		
674		<i>Tab intentionally omitted.</i>		
		MAPS OF UKRAINE		
675		Google map	USA-00022238	No Objection
676		Google map - Ukraine outlined	USA-00022239	No Objection
677		Map of Ukraine	USA-00022214	No Objection
678		Central and Eastern Europe	USA-00022215	No Objection

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

GREGORY B. CRAIG,

Defendant.

Case No. 1:19-cr-0125 (ABJ)

DEFENDANT'S TRIAL EXHIBIT LIST

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
1	2/13/2012	USA-REL-0157968	Email chain among G. Craig and C. Sloan regarding a retainer and FARA registration					No Objection
2	2/13/2012	USA-REL-0157998	Email chain among C. Sloan and D. Zornow regarding requested report from D. Schoen and V. Pinchuk					Hearsay
3	2/20/2012	USA-0014470	Emails between G. Craig and C. Sloan regarding draft retainer agreement					No Objection
4	2/20/2012	USA-REL-0000410	Email chain among P. Manafort and G. Craig regarding the Skadden-MoJ engagement letter					No Objection
5			<i>Withdrawn</i>					
6	2/24/2012	USA-REL-0158047	Email chain between G. Craig, C. Sloan, and D. Zornow regarding retainer letter					No Objection
7			<i>Withdrawn</i>					
8	3/15/2012	USA-REL-0110414	Email from C. Sloan to G. Craig regarding rescheduling the trip to Kiev					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
9	3/15/2012	USA-REL-0176878	Email from G. Craig to C. Sloan regarding rescheduling the trip to Kiev					No Objection
10			<i>Withdrawn</i>					
11	3/17/2012	USA-REL-0008074	Email from P. Manafort to G. Craig regarding a meeting about fees					No Objection
12	3/17/2012	USA-REL-0008076	Email from G. Craig to P. Manafort to request a meeting about fees					No Objection
13	3/19/2012	USA-REL-0176883	Email from C. Sloan to G. Craig regarding rescheduling the trip to Kiev					No Objection
14	3/20/2012	USA-REL-0000470	Email chain among D. Schoen, G. Craig, and P. Manafort regarding rescheduling of the Kiev trip					No Objection
15	3/20/2012	USA-REL-0027611	D. Schoen handwritten note to G. Craig					No Objection
16	3/30/2012	USA-REL-0110446	Email forward from C. Whitney to G. Craig attaching memorandum regarding initial trip to Ukraine and attorney profiles					No Objection
17	4/2/2012	USA-REL-0027686	Email from D. Schoen to G. Craig regarding breakfast with V. Pinchuk					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
18	4/2/2012	USA-REL-0176993	Email from G. Craig to A. van der Zwaan, C. Sloan, and A. Haskell attaching a memorandum containing initial project description					No Objection
19	4/5/2012	USA-REL-0000038	Retainer Memorandum re Terms and Conditions					Completeness
20	4/5/2012	USA-REL-0177339	Memorandum from G. Craig to V. Pshonka regarding two projects					No Objection
21	4/7/2012	USA-REL-0110871	Email from G. Craig to C. Sloan forwarding message from D. Schoen regarding V. Pinchuk					No Objection
22	4/10/2012	USA-0014622	Emails among C. Craig, D. Zornow, and C. Sloan regarding need to talk					No Objection
23	4/10/2012	USA-REL-0007958	Retainer Memorandum re Terms and Conditions					Completeness
24	4/11/2012	USA-REL-0111343	Email chain among A. van der Zwaan, G. Craig, and C. Sloan regarding incorporating FARA language into retainer agreement					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
25	4/23/2012	USA-0014026	Emails between A. Haskell and M. Cowie regarding application of FARA					No Objection
26	4/26/2012	USA-REL-0341915	Email chain among J. Hawker and E. Reilly regarding the former's discussion with M. Cowie about prospective Ukraine job					No Objection
27	5/1/2012	USA-REL-0360839	Email chain among M. Beauregard, E. Reilly and J. Hawker regarding M. Cowie call on Ukraine job					No Objection
28	5/9/2012	USA-REL-0350174	Email chain between J. Hawker and J. Aarons regarding travel to Kiev					No Objection
29			<i>Withdrawn</i>					
30	5/10/2012	USA-REL-0008357	Email chain among P. Manafort, G. Craig, and A. van der Zwaan regarding payment to FTI					No Objection
31			<i>Withdrawn</i>					
32	5/10/2012	USA-REL-0178711	Email from A. van der Zwaan to B. Kelly and G. Craig regarding payment to FTI					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
33	5/10/2012	USA-REL-0346580	Email chain among R. Bhavnani, M. Malloch-Brown, and J. Hawker regarding deciding to take Ukraine job					No Objection
34	5/11/2012	USA-REL-0178938	Email chain between N. Sadiq, D. Nordlinger, and A. van der Zwaan regarding FTI engagement					Hearsay
35	5/12/2012	USA-REL-0359452	Email chain among J. Aarons and S. Elliott confirming that project will proceed					No Objection
36	5/12/2012	USA-REL-0360408	Email from E. Reilly to M. Malloch-Brown with draft memo regarding FTI decision to represent Ukraine Prosecutor General					No Objection
37	5/13/2012	USA-REL-0342463	Email from J. Aarons to R. Gates and J. Hawker forwarding draft letter of engagement					No Objection
38	5/14/2012	USA-REL-0342203	Email from R. Hall to J. Hawker and J. Aarons attaching list of potential media contacts					No Objection
39	5/15/2012	USA-REL-0345228	Email from J. Hawker to J. Aarons, R. Hall and S. Elliott attaching draft media strategy					No Objection
40	5/16/2012	USA-REL-0354095	Email from J. Aarons to R. Gates regarding discussions with Prosecutor General					No Objection
41	5/16/2012	USA-REL-0049545	Email among A. van der Zwaan and G. Craig regarding contract					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
42	5/17/2012	USA-REL-0345315	Email chain among T. Leigh, J. Hawker and J. Aarons regarding FTI contract negotiation					No Objection
43	5/18/2012	USA-REL-0341486	Email chain among J. Aarons and E. Reilly regarding who will pay FTI bills					No Objection
44	5/20/2012	USA-REL-0000817	Email from O. Zhylinska (on behalf of G. Craig) to P. Manafort attaching interim report					No Objection
45			<i>Withdrawn</i>					
46	5/24/2012	USA-REL-0000859	Email chain among A. van der Zwaan, R. Gates, G. Craig, K. Kilimnik, et al. regarding the Skadden-MoJ engagement letter					No Objection
47	5/24/2012	USA-REL-0115981	Email chain among A. van der Zwaan, G. Craig, et al. regarding final MoJ press release					Hearsay
48	5/24/2012	USA-REL-0344100	Email chain between J. Aarons and J. Hawker forwarding discussions with R. Gates about payment					No Objection
49	5/24/2012	USA-REL-0345393	Email from J. Aarons to J. Hawker regarding call from R. Gates advising that FTI will be a sub-contractor of Skadden					No Objection
50	5/24/2012	USA-REL-0352955	Email chain among E. Reilly, J. Aarons and T. Leigh forwarding email ultimatum to R. Gates					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
51	5/25/2012	USA-REL-0116030	Email chain among A. van der Zwaan and G. Craig regarding the Skadden-MoJ engagement letter					Hearsay
52	5/25/2012	USA-REL-0341515	Email chain among R. Aarons, E. Reilly and T. Leigh regarding contacting G. Craig about subcontracting with Skadden					No Objection
53	5/29/2012	USA-REL-0029205	Email chain among E. Reilly, G. Craig, J. Aarons, et al. regarding FTI engagement					No Objection
54	5/29/2012	USA-REL-0031433	Engagement letter from J. Aarons to G. Craig regarding Strategic Communications Services Project					No Objection
55	5/29/2012	USA-REL-0341349	Email chain among E. Reilly, J. Hawker, J. Aarons, T. Leigh regarding Ukraine engagement					No Objection
56	5/30/2012	USA-REL-0170909	Email from A. Haskell to G. Craig, M. Loucks, M. Cowie, et al. attaching a list of Tymoshenko's acts of deceit, dishonesty, and neglect of duty					No Objection
57	5/30/2012	USA-REL-0179635	Email chain between G. Craig and S. Vlasenko regarding a meeting					No Objection
58	5/31/2012	USA-REL-0171195	Email from A. Haskell forwarding message from A. Haskell regarding factual disputes					No Objection
59	5/31/2012	USA-REL-0341318	Emails between J. Aarons and E. Reilly regarding possibility of FTI subcontracting under Skadden					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
60	6/0/2012	USA-REL2-0000174	Draft ECFMU release					F.R.E. 401, Foundation
61	6/2/2012	USA-REL-0348623	Email from J. Aarons to R. Gates threatening to stop work if contract is not signed					Hearsay
62	6/4/2012	USA-REL-0050141	Email chain among G. Craig, A. van der Zwaan, M. Cowie, et al. regarding FTI engagement					Hearsay
63	6/6/2012	USA-REL-0341131	Email from J. Aarons to E. Reilly regarding lack of clarity on the contract					No Objection
64	6/6/2012	USA-REL-0358917	Email from J. Aarons to R. Gates regarding Deputy Prosecutor General trip to US					No Objection
65	6/7/2012	USA-REL-0171629	Email from A. Haskell to G. Craig, C. Sloan, et al. regarding S. Vlasenko					No Objection
66	6/15/2012	USA-REL-0346892	Email from R. Hall to J. Hawker and J. Aarons attaching media strategy document					No Objection
67	6/19/2012	USA-REL-0344971	Email from R. Gates to J. Hawker advising that draft contract with FTI is forthcoming					No Objection
68	6/20/2012	USA-REL-0198646	Email from C. Sloan to P. Kerlin agreeing to a meeting					No Objection
69	6/20/2012	USA-REL-0215701	Email to P. Kerlin containing Westlaw research regarding FARA					No Objection
70	6/20/2012	USA-REL-0342678	Email chain among J. Aarons, R. Gates and J. Hawker regarding FTI contract					No Objection
71	6/24/2012	USA-REL2-0003962	Email from R. Gates regarding release of the Skadden Report					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
72			<i>Withdrawn</i>					
73	6/28/2012	USA-REL2-0010651	Email chain among C. Antelo, K. Griffis, A. Kauders and K. Zoeller regarding article about Tymoshenko meeting with Skadden					Hearsay
74	6/29/2012	USA-REL-0172860	Email chain among A. Haskell, A. van der Zwaan, et al. regarding meeting with Tymoshenko					F.R.E. 401
75	7/9/2012	USA-REL-0121164	Email from A. van der Zwaan to G. Craig regarding FTI engagement					No Objection
76	7/9/2012	USA-REL-0221273	Email chain among A. van der Zwaan and A. Haskell regarding document translations					Hearsay, F.R.E. 401
77	7/10/2012	USA-REL-0345272	Email chain among R. Gates, J. Aarons and J. Hawker attaching list of contacts for Skadden Report					No Objection
78	7/12/2012	USA-REL-0346836	Email from J. Hawker to J. Aarons advising Skadden Report to be released July 23					No Objection
79	7/17/2012	USA-REL-0356184	Email from J. Aarons to O. Leonov with news that Skadden Report is being delayed					No Objection
80	7/18/2012	USA-REL-0223827	Email from A. Kedem to A. van der Zwaan regarding Project One					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
81	7/25/2012	USA-REL-0200363	Email from A. Kedem to C. Sloan regarding the selective prosecution section of the Skadden Report					No Objection
82			<i>Withdrawn</i>					
83	7/29/2012	USA-REL-0183997	Email from G. Craig to C. Sloan, A. Haskell, A. van der Zwaan, and A. Kedem regarding a Russian translation of the Skadden Report					No Objection
84	7/30/2012	USA-REL-0000923	Email from G. Craig to P. Manafort suggesting the English version should be the official version of the Skadden Report					Hearsay
85	7/30/2012	USA-REL-0055837	Email forward from G. Craig to A. van der Zwaan regarding Russian and Ukrainian translations of the Skadden Report					No Objection
86	7/30/2012	USA-REL-0184023	Email chain among G. Craig, A. Haskell, A. Kedem, and C. Sloan regarding Russian and Ukrainian translations of the Skadden Report					No Objection
87	7/30/2012	USA-REL-0350131	Email chain among R. Gates, J. Aarons, J. Hawker and A. van der Zwaan scheduling call					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
88	7/31/2012	USA-REL-0000925	Email chain among P. Manafort and G. Craig regarding Russian and Ukrainian translations of the Skadden Report					No Objection
89	8/2/2012	USA-REL-0158616	Email chain between P. Manafort and G. Craig regarding proposed comments					No Objection
90	8/3/2012	USA-0017286	Email chain between P. Manafort and G. Craig regarding proposed comments					No Objection
91	8/7/2012	USA-REL-0136195	Email chain among A. van der Zwaan, G. Craig, C. Sloan, et al. regarding Russian and Ukrainian translations of the Skadden Report					No Objection
92	8/9/2012	USA-REL-0176345	Email from S. Zaki to M. Porter, A. van der Zwaan, M. Loucks, et al. regarding Skadden Stink article					No Objection
93	8/9/2012	USA-REL-0342507	Email from J. Hawker to R. Gates attaching master control grid					No Objection
94	8/10/2012	USA-0014809	Email between A. van der Zwaan, G. Craig, C. Sloan, A. Kedem, A. Haskell regarding comments					No Objection
95	8/16/2012	USA-0015568	Email among A. van der Zwaan, O. Smolova, G. Craig, C. Sloan, A. Kedem, and A. Haskell re comments					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
96	8/23/2012	USA-REL-0167392	Email chain among A. Haskell, C. Sloan, A. Kedem, et al. regarding a response to an email from S. Vlasenko					No Objection
97	8/24/2012	USA-REL-0167403	Email from A. van der Zwaan to G. Craig, C. Sloan, A. Kedem, and A. Haskell attaching proposed comments					No Objection
98	8/24/2012	USA-REL-0350482	Email from J. Aarons to R. Gates and J. Hawker attaching communications strategy document					No Objection
99	8/24/2012	USA-REL2-0025200	Email chain among T. Podesta, K. Griffis, K. Fritts, and R. Edgar re: SA report					Hearsay
100	8/27/2012	USA-REL-0016804	Email chain between G. Craig and P. Manafort regarding proposed comments for the Skadden Report					No Objection
101	8/27/2012	USA-REL-0187233	Email chain among A. Haskell, C. Sloan, A. Kedem, et al. regarding an email from S. Vlasenko					No Objection
102	8/28/2012	USA-REL-0162990	Email forward from G. Craig to C. Whitney attaching media plan					No Objection
103	8/28/2012	USA-REL-0337749	FTI Media Plan					No Objection
104	8/30/2012	USA-REL-0073935	Email chain among G. Craig, A. van der Zwaan, A. Haskell, et al. regarding finalizing the Skadden Report					Hearsay

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
105	8/30/2012	USA-REL-0167421	Email from A. van der Zwaan to G. Craig, C. Sloan, A. Kedem, and A. Haskell attaching proposed comments					No Objection
106	8/30/2012	USA-REL-0344875	Email from J. Aarons to J. Hawker attaching draft strategy memos for P. Manafort and R. Gates					No Objection
107	9/2/2012	USA-REL-0006022	Email chain among P. Manafort and G. Craig regarding J. Hawker's opinion of the Skadden Report					No Objection
108	9/2/2012	USA-REL-0006028	Email from P. Manafort to G. Craig attaching letter from K. Kilimnik					No Objection
109	9/3/2012	USA-REL-0006057	Email chain between G. Craig and P. Manafort regarding proposed comments for the Skadden Report					No Objection
110	9/3/2012	USA-REL-0016828	Email chain among G. Craig, P. Manafort, and C. Sloan regarding comments to the draft Skadden Report					No Objection
111	9/3/2012	USA-REL-0074026	Email chain among G. Craig and A. van der Zwaan regarding comments to the draft Skadden Report					Hearsay
112	9/4/2012	USA-REL-0167429	Email from A. van der Zwaan to G. Craig, A. Haskell, A. Kedem and C. Sloan attaching translated comments from Ukraine on the Skadden Report					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
113	9/7/2012	USA-REL-0346586	Email from J. Hawker to J. Aarons regarding uncertain timing of the release of Skadden Report					No Objection
114	9/7/2012	USA-REL-0348736	Emails between J. Hawker and K. Kilimnik regarding Skadden wanting to meet with Y. Tymoshenko					No Objection
115	9/8/2012	USA-REL-0145065	Email chain among A. van der Zwaan, G. Craig, C. Sloan, et al. regarding getting a copy of the Skadden Report to R. Gates					No Objection
116	9/10/2012	USA-REL-0006105	Email chain among P. Manafort and G. Craig regarding the release of the Skadden Report					No Objection
117	9/10/2012	USA-REL-0016891	Email from G. Craig to P. Manafort attaching draft Skadden Report in English					No Objection
118	9/10/2012	USA-REL-0017204	Email from G. Craig to P. Manafort attaching executive summary of the Skadden Report					No Objection
119	9/11/2012	USA-0014002	Email among A. Haskell, A. Kedem, G. Craig, C. Sloan regarding final tweaks					No Objection
120	9/11/2012	USA-REL-0006119	Email from P. Manafort to G. Craig attaching revisions to final Skadden Report					No Objection
121	9/11/2012	USA-REL-0017225	Email from G. Craig to P. Manafort regarding proposed comments					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
122	9/11/2012	USA-REL-0342754	Email from J. Hawker to J. Aarons attaching version 2 of "A More Modern Ukraine" memo					No Objection
123	9/12/2012	USA-REL-0344308	Email from J. Hawker to R. Gates attaching master control grid					No Objection
124	9/12/2012	USA-REL-0344806	Email from J. Hawker to J. Aarons attaching draft project veritas messaging					No Objection
125	9/12/2012	USA-REL-0348498	Email from J. Hawker to R. Gates attaching "FTI Cut Down Media Plan" for when the report is released					No Objection
126	9/12/2012	USA-REL-0350077	Email from J. Hawker to R. Gates attaching Q and A for Ministry of Justice and draft statements on Skadden Report					No Objection
127	9/12/2012	USA-REL-0350707	Email from J. Hawker to R. Gates attaching master control grid					No Objection
128	9/13/2012	USA-REL-0342819	Emails between K. Kilimnik and J. Hawker regarding using the Ministry of Justice comments to Skadden for preparing Q and As					No Objection
129	9/13/2012	USA-REL-0343536	Email from K. Kilimnik to J. Hawker attaching Ministry of Justice suggestions on draft report					No Objection
130	9/13/2012	USA-REL-0347816	Email from J. Hawker to R. Gates regarding draft PR response for Skadden to use					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
131	9/14/2012	USA-0014852	Email from A. van der Zwaan to G. Craig, C. Sloan, A. Kedem, and A. Haskell attaching proposed comments					No Objection
132	9/17/2012	USA-REL-0342595	Email from R. Gates attaching P. Manafort comments on FTI media package					No Objection
133	9/17/2012	USA-REL2-0003549	C. Antelo email to R. Gates regarding ECFMU Strategy for committee Senators					F.R.E. 401
134	9/18/2012	USA-REL-0007076	Email chain among R. Gates and G. Craig regarding comments					No Objection
135	9/20/2012	USA-REL-0007096	Email from P. Manafort to G. Craig attaching proposed changes to the Skadden Report					No Objection
136	9/20/2012	USA-REL-0007103	Email from P. Manafort to G. Craig attaching comments for the Skadden Report and proposing a group meeting					No Objection
137	9/20/2012	USA-REL-0018509	Email chain among G. Craig and P. Manafort regarding proposed changes to the Skadden Report					No Objection
138			<i>Withdrawn</i>					
139	9/20/2012	USA-REL-0148288	Email chain among A. Haskell, A. van der Zwaan, G. Craig, et al. attaching proposed changes to the Skadden Report from R. Gates					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
140	9/20/2012	USA-REL-0193817	Email chain among B. Jackson and G. Craig regarding Ukraine					No Objection
141	9/21/2012	USA-REL-0007129	Email forward from K. Kilimnik to A. van der Zwaan attaching the FTI Media Plan					No Objection
142	9/21/2012	USA-REL-0344446	Email from A. van der Zwaan to J. Hawker, P. Manafort cc'ing G. Craig attaching copy of Skadden Report					No Objection
143	9/23/2012	USA-REL-0233100	Email from A. van der Zwaan to A. Haskell regarding a proposed change to the Skadden Report					Hearsay
144			<i>Withdrawn</i>					
145	9/23/2012	USA-REL-0345494	Email from K. Kilimnik to J. Hawker attaching Ukraine comments on Skadden Report					Hearsay, F.R.E. 401
146			<i>Withdrawn</i>					
147	9/24/2012	USA-REL-0347958	Email from R. Gates to J. Hawker attaching his notes from meeting at Harvard Club					No Objection
148	9/25/2012	USA-0008962	Email chain among A. Haskell and C. Sloan regarding FTI "veritas Message Master" document					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
149	9/25/2012	USA-REL-0019666	Email from J. Hawker to G. Craig, P. Manafort, and R. Gates attaching the FTI Media Plan					No Objection
150	9/25/2012	USA-REL-0026966	Email forward from R. Gates to A. van der Zwaan including the message from G. Craig that there is "a lot of stuff in here that is just wrong."					No Objection
151	9/25/2012	USA-REL-0149983	Email chain among C. Sloan and G. Craig regarding paying and backgrounding journalists					No Objection
152	9/25/2012	USA-REL-0150939	Email chain among C. Sloan, G. Craig, J. Hawker, et al. regarding the FTI Media Plan					No Objection
153	9/25/2012	USA-REL-0150948	Email from C. Sloan to G. Craig about draft comments regarding the FTI Media Plan					No Objection
154	9/25/2012	USA-REL-0191269	Email from C. Sloan to G. Craig with draft comments regarding the FTI Media Plan					No Objection
155	9/25/2012	USA-REL-0342422	Email from A. van der Zwaan to J. Hawker confirming receipt of FTI draft messaging and providing a copy of Skadden Report					No Objection
156	9/25/2012	USA-REL-0345373	Email from J. Hawker to R. Gates attaching draft news release for Ministry of Justice					Hearsay

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157	9/25/2012	USA-REL-0348868	Email from J. Hawker to R. Gates attaching changes to media package					No Objection
158			<i>Withdrawn</i>					
159	9/26/2012	USA-REL-0159022	Email chain among G. Craig and J. Hawker regarding changes to the FTI Media Plan					No Objection
160	9/26/2012	USA-REL-0343523	Email from P. Manafort to R. Gates, K. Kilimnik and J. Hawker attaching his analysis and an overview of the Skadden Report					No Objection
161	9/26/2012	USA-REL-0345420	Email from R. Gates to J. Hawker attaching new Skadden Report outreach list - key political and media contacts					No Objection
162	9/27/2012	USA-REL-0346213	Email from P. Manafort to J. Hawker, R. Gates and K. Kilimnik attaching outline of key findings of Skadden Report					No Objection
163	9/27/2012	USA-REL2-0020455	Email chain among A. Kauders, C. Antelo, and K. Griffis, regarding call with R. Gates					Hearsay
164	9/28/2012	USA-REL2-0003963	R. Gates email to MCW and PDG regarding DC Plan					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
165	9/29/2012	USA-REL-0096765	Email chain among G. Craig, A. van der Zwaan, K. Kilimnik, et al. regarding changes to the Skadden Report					Hearsay, F.R.E. 401
166			<i>Withdrawn</i>					
167	9/29/2012	USA-REL-0345098	Email from R. Gates attaching timeline and Skadden Report outreach list					No Objection
168	9/30/2012	USA-REL-0342570	Email from R. Gates to J. Hawker attaching Skadden Report release planning document					No Objection
169	9/30/2012	USA-REL-0342832	Email from R. Gates to J. Hawker regarding Wave 2 of media engagement.					No Objection
170	9/30/2012	USA-REL-0346200	Email from R. Gates to P. Manafort to K. Kilimnik and J. Hawker attaching media plan documents					No Objection
171	10/1/2012	USA-REL2-0017111	A. Wright email to MCW and PDG regarding ECFMU/Ukraine Call					No Objection
172	10/2/2012	USA-REL-0096824	Email forward from A. van der Zwaan to G. Craig attaching proposed comments					No Objection
173	10/2/2012	USA-REL-0191382	Email chain between A. van der Zwaan and G. Craig regarding proposed comments					No Objection
174	10/2/2012	USA-REL-0346343	Email from P. Manafort to J. Hawker, R. Gates and K. Kilimnik attaching additions to media package					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
175	10/3/2012	USA-REL-0349345	Email from J. Hawker to R. Gates attaching proposed outreach list for Skadden Report					No Objection
176	10/4/2012	USA-REL2-0003622	Email with attached memorandum from L. Saunders to I. Kirsch, M. Griffis, T. Podesta et al.					No Objection
177	10/8/2012	USA-0017497	Email from G. Craig, to P. Manafort regarding comments to report.					Hearsay
178	10/8/2012	USA-REL-0007585	Email from P. Manafort to G. Craig attaching comments for the Skadden Report					No Objection
179	10/8/2012	USA-REL-0098212	Email from A. Kedem to G. Craig, C. Sloan, A. Haskell, and A. van der Zwaan regarding proposed revisions to the Skadden Report					No Objection
180	10/8/2012	USA-REL-0098221	Email chain between A. van der Zwaan, G. Craig, A. Kedem, C. Sloan, and A. Haskell regarding proposed comments					No Objection
181	10/8/2012	USA-REL-0098227	Email from A. Kedem to G. Craig, C. Sloan, A. Haskell, and A. van der Zwaan regarding proposed revisions to the Skadden Report					No Objection
182	10/8/2012	USA-REL-0342694	Email from S. Galvin to J. Hawker regarding notes on meeting with P. Manafort in Kiev					Hearsay
183	10/16/2012	USA-REL-0007589	Email from G. Craig to P. Manafort regarding delivery of the Skadden Report					Hearsay, F.R.E. 401

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
184	10/16/2012	USA-REL-0151966	Email chain among A. van der Zwaan and G. Craig regarding delivery of the Skadden Report to the MoJ					Hearsay, F.R.E. 401
185			<i>Withdrawn</i>					
186	10/22/2012	USA-0012555	Email from G. Craig to C. Sloan, A. Haskell, A. van der Zwaan, and A. Kedem regarding the report					Hearsay, F.R.E. 401
187	10/27/2012	USA-REL-0364972	Email from K. Griffis to J. Hawker attaching list of journalists					Hearsay, F.R.E. 401
188	10/31/2012	USA-0020855	A. Wright and L. Saunders gchat after ECFMU call					Hearsay, F.R.E. 401
189	11/19/2012	USA-0017507	Email from G. Craig to P. Manafort regarding final issues					No Objection
190	11/19/2012	USA-REL-0193967	Email chain between A. Haskell and G. Craig regarding proposed comments					No Objection
191	11/26/2012	USA-REL-0019749	Email from G. Craig to P. Manafort regarding overview memo					No Objection
192	11/27/2012	USA-REL-0020057	Email from R. Gates to A. van der Zwaan and K. Kilimnik attaching proposed comments					No Objection
193	11/27/2012	USA-REL-0105348	Email from A. van der Zwaan to G. Craig and A. Haskell attaching proposed changes to the Skadden Report					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
194	11/30/2012	USA-0017517	Email from P. Manafort to K. Kilimnik, R. Gates J. Hawker regarding Q&A material and the Briefing Process					No Objection
195	11/30/2012	USA-0020870	A. Wright and L. Saunders gchat about Skadden report roll-out					Hearsay
196	11/30/2012	USA-REL-0365485	Email from P. Manafort to K. Kilimnik, R. Gates J. Hawker attaching memo for S. Lyovochkin, FTI release memos and A. van der Zwaan recommendation for outside counsel familiar with the ECHR					No Objection
197	11/30/2012	USA-REL-0951627	Email from P. Manafort to Veritas team					Hearsay
198			<i>Withdrawn</i>					
199	12/6/2012	USA-0009124	Email from J. Hawker to R. Gates regarding Phase one media					No Objection
200	12/6/2012	USA-REL-0029944	Email among R. Gates, J. Hawker, A. Friedman, A. van der Zwaan, and K. Kilimnik regarding Project Veritas call.					No Objection
201	12/6/2012	USA-REL-0029946	Email among R. Gates, J. Hawker, A. Friedman, A. van der Zwaan, and K. Kilimnik regarding Project Veritas call					No Objection

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202	12/6/2012	USA-REL-0030744	Email chain among J. Hawker, A. van der Zwaan, R. Gates, et al. attaching the FTI Media Plan					No Objection
203	12/6/2012	USA-REL-0193987	Email from M. Lantz to G. Craig regarding the release of the Skadden Report					No Objection
204			<i>Withdrawn</i>					
205	12/7/2012	USA-0021010	A. Wright email regarding Mercury's ECFMU government relations strategy document for 2013					F.R.E. 401
206	12/7/2012	USA-REL2-0017274	Email chain from M. Tavlarides to T. Podesta et al. subject: Skadden Report					Hearsay
207	12/11/2012	N/A	Google Maps route view					No Objection
208	12/11/2012	USA-REL-0038299	Email chain among R. Gates, E. Sager, A. van der Zwaan, et al.					No Objection
209	12/11/2012	USA-REL-0191857	Email chain among G. Craig and A. van der Zwaan regarding A. Kwasniewski and C. Salvalaggio					No Objection
210			<i>Withdrawn</i>					
211	12/11/2012	USA-REL-0365783	Email from R. Gates to D. Kuleba, O. Voloshyn, K. Kilimnik, J. Hawker, A. Friedman, A. van der Zwaan and E. Sager					No Objection

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212	12/11/2012	USA-REL-0366919	Email from J. Hawker to R. Fletcher requesting an introduction to Tom Parfitt					No Objection
213	12/11/2012	USA-REL2-0017276	Email from M. Tavlarides to T. Podesta et al. subject: Skadden report update					Hearsay
214	12/12/2012	USA-REL-0161005	Email chain among D. Sanger and G. Craig regarding electronic delivery					No Objection
215	12/12/2012	USA-REL-0161006	Email chain among D. Sanger and G. Craig confirming hard copy delivery					No Objection
216	12/12/2012	USA-REL-0191873	Email chain among T. Parfitt and G. Craig regarding approval of quotes					No Objection
217			<i>Withdrawn</i>					
218	12/12/2012	USA-REL-0194884	Email chain among G. Craig, A. Haskell, D. Sanger, et al. regarding electronic delivery of the Skadden Report					No Objection
219	12/12/2012	USA-REL-0194885	Email chain among G. Craig and D. Sanger regarding electronic delivery of the Skadden Report					No Objection
220	12/12/2012	USA-REL-0365791	Email from R. Gates to A. van der Zwaan, A. Friedman, K. Kilimnik, J. Hawker and E. Sager					No Objection

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221	12/12/2012	USA-REL-0365818	Email chain among R. Gates, A. van der Zwaan, E. Sager, K. Kilimnik, J. Hawker and A. Friedman					Hearsay
222	12/12/2012	USA-REL-0365831	Email chain among R. Gates and A. van der Zwaan, J. Hawker and K. Kilimnik regarding meetings in Poland					No Objection
223			<i>Withdrawn</i>					
224	12/12/2012	USA-REL-0366993	Email from J. Hawker to T. Parfitt making contact for a possible story on Ukraine					No Objection
225	12/12/2012	USA-REL-0367310	Emails between J. Hawker and R. Gates regarding comments from Ministry of Justice for T. Parfitt at Telegraph					No Objection
226	12/12/2012	USA-REL-0367315	Email from J. Hawker to R. Gates regarding Telegraph					No Objection
227	12/12/2012	USA-REL-0367319	Email from J. Hawker to T. Parfitt providing answers to Telegraph questions for Ministry of Justice					No Objection
228	12/12/2012	USA-REL-0367333	Email from J. Hawker to R. Gates attaching Ministry of Justice release with tracked changes and advising that answers have been sent to Telegraph					No Objection

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229	12/12/2012	USA-REL-0367342	Email chain among J. Hawker and T. Parfitt regarding approved answers from O. Lavrinovich					No Objection
230	12/12/2012	USA-REL-0367351	Email from J. Hawker to R. Gates attaching rewrite of MOJ statement					No Objection
231	12/12/2012	USA-REL-0367358	Email from J. Hawker to R. Gates advising that he has emailed G. Craig with question from R. Gates					No Objection
232			<i>Withdrawn</i>					
233			<i>Withdrawn</i>					
234	12/12/2012	USA-REL2-0014719	Redlined draft analysis of Skadden Report					Hearsay, Lack of Foundation
235	12/12/2012		New York Times Article					No Objection
236	12/13/2012	N/A	The Daily Telegraph article by T. Parfitt					No Objection
237			<i>Withdrawn</i>					
238	12/13/2012	USA-REL-0007935	Email chain among R. Gates, C. Craig, J. Hawker, and A. van der Zwaan regarding inquiry by M. Danilova					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
239	12/13/2012	USA-REL-0039269	Email chain among L. Weiss, J. Hawker, and A. van der Zwaan regarding inquiry					No Objection
240	12/13/2012	USA-REL-0105659	Email chain among G. Craig, L. Weiss, A. van der Zwaan, et al. regarding Telegraph					No Objection
241	12/13/2012	USA-REL-0154222	Email forward from B. Jackson to G. Craig attaching MoJ press release					No Objection
242	12/13/2012	USA-REL-0154223	MoJ Press Release					Lack of Foundation
243	12/13/2012	USA-REL-0154225	Email from L. Weiss to M. Huisman attaching Skadden Report					No Objection
244	12/13/2012	USA-REL-0160134	Email from E. Alpert to G. Craig inquiring about the Skadden Report					No Objection
245	12/13/2012	USA-REL-0161318	Email chain among J. Slattery and G. Craig regarding call					No Objection
246	12/13/2012	USA-REL-0191909	Email from L. Weiss to S. Feldman and M. Porter regarding the release of the Skadden Report					No Objection
247	12/13/2012	USA-REL-0194001	Email forward from B. Jackson to G. Craig attaching ANSA article					No Objection
248	12/13/2012	USA-REL-0194895	Email chain among A. Haskell and G. Craig regarding Kiev Post article					No Objection

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249	12/13/2012	USA-REL-0194977	Email forward from G. Craig to S. Weisman including a link to the Kiev Post article					Hearsay
250	12/13/2012	USA-REL-0196939	Email from L. Weiss to G. Craig including Los Angeles Times article by E. Alpert					Incorrect date
251	12/13/2012	USA-REL-0361963	Email from R. Hall to R. Gates, K. Kilimnik and J. Hawker attaching summary of media coverage					No Objection
252	12/13/2012	USA-REL-0365894	Email from R. Gates to P. Manafort, K. Kilimnik, J. Hawker and E. Sager regarding Radio Free Europe					No Objection
253	12/13/2012	USA-REL-0365909	Email from R. Gates to J. Hawker and K. Kilimnik regarding ANSA article					No Objection
254	12/13/2012	USA-REL-0365910	Email from R. Gates to P. Manafort, K. Kilimnik E. Sager, K. Kilimnik, G. Fenton and J. Hawker regarding Ministry of Justice press release getting good coverage					No Objection

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255	12/13/2012	USA-REL-0365934	Email from R. Gates to P. Manafort, K. Kilimnik and J. Hawker regarding article					No Objection
256	12/13/2012	USA-REL-0365952	Emails between J. Hawker and R. Solash at Radio Free Europe regarding Skadden report and FTI					No Objection
257	12/13/2012	USA-REL-0365954	Email from R. Gates to J. Hawker requesting articles					No Objection
258	12/13/2012	USA-REL-0368645	Email thread among J. Hawker, L. Weiss and A. van der Zwaan regarding media inquiry					No Objection
259	12/13/2012	USA-REL-0368647	Email from J. Hawker to M. Huisman providing MOJ statement to National Law Journal					No Objection
260	12/13/2012	USA-REL-0951759	Emails between E. Sager and D. Kuleba regarding ANSA, New York Times and Telegraph					Hearsay
261	12/13/2012	USA-REL-0973091	E. Sager, A. Gianotti and A. Friedman emails regarding ANSA, New York Times and Telegraph					Hearsay
262	12/13/2012	USA-REL2-0003929	Email chain from B. Chang to Gates et al., subject: State Dept. react to New York Times article					Hearsay
263	12/13/2012	USA-REL2-0003931	Email chain from B. Chang to Gates et al., subject: State Dept. react to New York Times article					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
264			<i>Withdrawn</i>					
265	12/13/2012	USA-REL2-0026685	Email from R. Gates with attached Skadden Report Overview Points FINAL and MoJ Skadden Press Statement FINAL, subject: Skadden Arps - Report					No Objection
266	12/13/2012		National Law Journal Article					No Objection
267	12/13/2012		Los Angeles Times Article					No Objection
268	12/13/2012		Kiev Post article					Lack of Foundation (and exhibit)
269	12/14/2012	USA-REL-0160444	Email from L. Weiss to G. Craig, C. Sloan, and M. Porter including the revised National Law Journal article					No Objection
270	12/14/2012	USA-REL-0160447	Email chain among M. Huisman and G. Craig regarding revisions to the National Law Journal article					No Objection
271	12/14/2012	USA-REL-0160453	Email chain among L. Weiss, G. Craig, and M. Huisman regarding revisions to the National Law Journal article					No Objection
272	12/14/2012	USA-REL-0160454	Email from M. Huisman to G. Craig regarding revisions to the National Law Journal article					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
273	12/14/2012	USA-REL-0160457	Email chain among G. Craig, C. Sloan, and M. Huisman regarding revisions to National Law Journal article					No Objection
274	12/14/2012	USA-REL-0191918	Email chain among G. Craig and C. Sloan regarding call with L. Weiss to educate M. Huisman					No Objection
275	12/14/2012	USA-REL-0201024	Email from C. Sloan regarding National Law Journal article					No Objection
276	12/14/2012	USA-REL-0368648	Email from R. Gates to J. Hawker, K. Kilimnik and P. Manafort regarding FT coverage					No Objection
277	12/14/2012	USA-REL-0951774	E. Sager-A. Gianotti emails regarding ANSA					Hearsay
278	12/14/2012	USA-REL2-0021079	Email chain from T. Podesta to R. Gates, subject: US State Dept - Press Briefing					Hearsay
279	12/14/2012	USA-REL2-0026753	Email chain from B. Chang to M. Tavlarides et al., subject: US State Dept - Press Briefing					Hearsay
280	12/14/2012	USA-REL2-0148668	Email from V. Weber to R. Gates attaching a Strategy Doc from MCW					F.R.E. 401
281	12/14/2012	USA-REL2-0148669	Memorandum from MCW to R. Gates regarding ECFMU Government Relations Strategy					F.R.E. 401
282	12/16/2012	USA-REL-0374280	A. Friedman email to E. Sager and D. Kuleba forwarding 12/15 V. Stepanov email					Hearsay

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283	12/20/2012	USA-REL-0191960	Email chain between G. Craig, A. Haskell, and A. van der Zwaan regarding final Skadden Report					Hearsay
284	12/21/2012	USA-REL2-0003943	Email from M. Tavlarides to R. Gates, et al., subject: Google Alert - Tymoshenko					Hearsay
285	12/27/2012	USA-REL-0201032	Email chain among C. Sloan, L. Spiegel, G. Craig, et al. regarding response to December 18, 2012 NSD letter					No Objection
286	12/27/2012	USA-REL-0304546	Email chain among L. Spiegel, C. Sloan, B. Kelly, et al. regarding response to December 18, 2012 NSD letter					No Objection
287	12/27/2012	USA-REL-0304552	Email chain among C. Sloan, L. Spiegel, B. Kelly, et al. regarding response to December 18, 2012 NSD letter					No Objection
288			<i>Withdrawn</i>					
289	1/4/2013	USA-REL-0304592	Email chain among C. Sloan, L. Spiegel, and G. Craig regarding response to December 18, 2012 NSD letter					No Objection
290	1/4/2013	USA-REL-0336987	Email from G. Craig to L. Spiegel and C. Sloan regarding response to December 18, 2012 NSD letter					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
291	1/11/2013	USA-REL-0304624	Email chain between G. Craig and L. Spiegel regarding a draft response to the NSD					No Objection
292	1/14/2013	USA-REL-0304628	Email chain among L. Spiegel, C. Sloan, and G. Craig regarding response to NSD					No Objection
293	1/18/2013	USA-REL-0304635	Email chain among C. Sloan and G. Craig regarding response to December 18, 2012 NSD letter					No Objection
294	1/18/2013	USA-REL-0304636	Email from G. Craig to L. Spiegel and C. Sloan regarding response to December 18, 2012 NSD letter					No Objection
295	2/5/2013	USA-REL-0304649	Email from C. Sloan to G. Craig regarding response to December 18, 2012 NSD letter					No Objection
296			<i>Withdrawn</i>					

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
297	4/22/2013	USA-REL-0160520	Email chain among C. Sloan, G. Craig, L. Weiss, and M. Porter regarding contact with National Law Journal and Los Angeles Times					No Objection
298			<i>Withdrawn</i>					
299	4/29/2013	USA-REL-0155415	Email from L. Weiss to G. Craig and M. Porter					No Objection
300	4/29/2013	USA-REL-0304736	Email from G. Craig to C. Sloan regarding response to April 9, 2013 NSD letter					No Objection
301	4/30/2013	USA-REL2-0012838	Email chain from M. Baker to M. Tavlarides, et al., subject: good times					Hearsay
302	5/1/2013	USA-REL-0304738	Email from G. Craig to C. Sloan regarding response to April 9, 2013 NSD letter					No Objection
303	5/1/2013	USA-REL-0339232	Email from G. Craig to C. Whitney regarding response to April 9, 2013 NSD letter					No Objection
304			<i>Withdrawn</i>					
305	6/3/2013	USA-REL-0340518	Email chain among G. Craig to C. Whitney regarding response to April 9, 2013 NSD letter					No Objection
306	9/24/2013	USA-REL-0304869	Email forward from G. Craig to L. Spiegel regarding call from A. Mudd at the DOJ					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
307	10/10/2013	USA-0009489	Email chain among G. Craig, K. Gross, and L. Spiegel regarding draft response to NSD					No Objection
308	10/10/2013	USA-REL-0245986	Email from K. Gross to G. Craig regarding meeting with NSD					No Objection
309	10/10/2013	USA-REL-0303739	Email chain among G. Craig, L. Weiss, and C. Sloan regarding National Law Journal article					No Objection
310	10/10/2013	USA-REL-0336957	Undated, draft response to September 5, 2013 letter from the NSD					No Objection
311	10/11/2013	USA-REL-0197517	Email from C. Whitney to A. Mudd attaching October 10, 2013 letter to NSD					No Objection
312	10/14/2013	USA-REL-0160836	Email chain among L. Weiss, G. Craig, and C. Sloan regarding National Law Journal article					No Objection
313	1/14/2014	USA-REL-0721926	Email from A. Haskell to C. Sloan regarding S. Vlasenko					F.R.E. 401
314	1/27/2014	USA-REL-0722977	Email from G. Craig to C. Sloan attaching DOJ letter					No Objection
315			<i>Withdrawn</i>					

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
316			<i>Withdrawn</i>					
317	2/27/2014	USA-REL-0305200	Email from G. Craig to L. Spiegel attaching memorandum of conversation with H. Hunt					Hearsay, F.R.E. 401
318	9/0/2016	(no bates number)	Audit of the National Security Division's Enforcement and Administration of the Foreign Agents Registration Act					F.R.E. 401, 403
319	7/26/2017		Adam Hickey's 2017 Testimony to Senate Judiciary Committee					F.R.E. 401, 403
320	2/21/2018	N/A	Transcript of arraignment and plea hearing of A. van der Zwaan					F.R.E. 401, 403, Completeness
321			<i>Withdrawn</i>					
322	3/27/2018	N/A	Government's sentencing memorandum for A. van der Zwaan					F.R.E. 401, 403
323			<i>Withdrawn</i>					
324	4/3/2018	N/A	Transcript of sentencing of A. van der Zwaan					F.R.E. 401, 403, Completeness

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
325			<i>Withdrawn</i>					
326	3/22/2019		Manafort Judgment in 17-CR-00201					F.R.E. 401, 403
327	5/13/2019		Manafort Judgment in 18-CR-00083					F.R.E. 401, 403
328			<i>Withdrawn</i>					
329	3/21/2012	USA-REL-0027629	Email chain between G. Craig and D. Schoen regarding the retainer					No Objection
330			Nicholas Katzenbach's 1963 Testimony to the Senate Foreign Relations Committee					F.R.E. 401, 403
EXHIBITS CONDITIONALLY DESIGNATED PENDING RULING ON MR. CRAIG'S MOTION IN LIMINE REGARDING UKRAINE PROCUREMENT EVIDENCE:								
DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
331	8/13/2012	USA-REL-0158629	Email chain among C. Whitney and D. Schoen regarding setting up a call with G. Craig					No Objection
332	8/15/2012	USA-REL-0029703	Email chain among D. Schoen and G. Craig regarding a call					No Objection
333	8/15/2012	USA-REL-0009980	Email from G. Craig to P. Manafort and C. Sloan regarding Pinchuk					No Objection
334	8/15/2012	USA-REL-0136415	Email chain among C. Whitney, A. van der Zwaan, A. Haskell, and K. Kilimnik regarding letter from A. Sedov					Hearsay
335	12/20/2012	USA-REL-0000056	Letter from A. Sedov to G. Craig					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
336	1/3/2013	USA-REL-0245648	Email chain among C. Whitney and C. Sloan regarding Skadden-MoJ engagement letter					No Objection
337	1/4/2013	USA-REL-0154922	Email chain among G. Craig, C. Sloan, and P. Manafort attaching documents regarding the Skadden-MoJ contract					No Objection
338	2/6/2013	USA-REL-0000058	Email from G. Craig to V. Gurtenko attaching letter to A. Sedov					No Objection
339	2/8/2013	USA-REL-0020247	Email chain among A. van der Zwaan, K. Kilimnik, P. Manafort, et al. regarding engagement letter					No Objection
340	2/15/2013	USA-REL-0008030	Email from V. Gurtenko to G. Craig, K. Kilimnik, P. Manafort, and A. van der Zwaan regarding contract					No Objection
341	2/18/2013	USA-REL-0195945	Email chain among G. Craig, A. van der Zwaan, and V. Gurtenko regarding contract					No Objection
342	2/19/2013	USA-REL-0245730	Email chain among G. Craig and A. van der Zwaan regarding contract					No Objection
343	2/25/2013	USA-REL-0196096	Email chain among A. van der Zwaan, G. Craig, and V. Gurtenko regarding contract					No Objection
344	2/25/2013	USA-REL-0196067	Email chain among A. van der Zwaan, V. Gurtenko, G. Craig, and C. Sloan regarding contract					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
345	2/25/2013	USA-REL-0303512	Email chain among C. Whitney, G. Craig, and A. van der Zwaan regarding engagement letter					No Objection
346	2/26/2013	USA-REL-0108771	Email chain among G. Craig, C. Sloan, A. van der Zwaan, et al. regarding engagement letter					No Objection
347	2/26/2013	USA-REL-0008044	Email chain among G. Craig and P. Manafort regarding engagement letter					No Objection
348	2/27/2013	USA-REL-0008047	Email chain among P. Manafort and G. Craig regarding engagement letter					No Objection
349	2/28/2013	USA-REL-0039403	Email forward from A. van der Zwaan to R. Gates regarding contract					No Objection
350	3/1/2013	USA-REL-0245757	Email forward from G. Craig to C. Sloan regarding contract					No Objection
351	3/4/2013	USA-REL-0196410	Email chain among C. Whitney, V. Gurtenko, and A. van der Zwaan attaching draft contract					No Objection
352	3/5/2013	USA-REL-0008048	Email chain among G. Craig and P. Manafort regarding contract					No Objection
353	3/5/2013	USA-REL-0196470	Email forward from A. van der Zwaan to G. Craig and C. Whitney regarding contract					No Objection
354	3/11/2013	USA-REL-0196533	Email chain among A. van der Zwaan, V. Gurtenko, and G. Craig regarding contract					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
355	3/11/2013	USA-REL-0196540	Email chain among A. van der Zwaan, G. Craig, and C. Whitney regarding contract					No Objection
356	3/14/2013	USA-REL-0304665	Email forward from G. Craig to C. Sloan and L. Spiegel attaching engagement letter and contract					No Objection
357	3/19/2013	USA-REL-0236679	Email chain between A. van der Zwaan and C. Whitney regarding proposed changes to the MoJ contract					Hearsay
358	3/20/2013	USA-REL-0245856	Email chain among C. Whitney and A. van der Zwaan regarding billing					Hearsay
359	3/20/2013	USA-REL-0337733	Disbursement Detail from Skadden regarding MoJ account					Completeness
360	3/27/2013	USA-REL-0008060	Email chain among P. Manafort and G. Craig regarding final bill					No Objection
361	4/2/2013	USA-REL-0196694	Email forward from A. van der Zwaan to G. Craig attaching table annex					No Objection
362	4/9/2013	USA-REL-0196762	Email from A. van der Zwaan to V. Gurtenko, G. Craig, and C. Sloan attaching engagement letter and contract					No Objection
363	4/10/2013	USA-REL-0196774	Email chain among A. van der Zwaan, V. Gurtenko, G. Craig, and C. Sloan regarding contract					No Objection
364	4/15/2013	USA-REL-0108831	Email from C. Whitney to A. van der Zwaan attaching invoice					No Objection

DX	DATE	PRODUCTION BATES	DESCRIPTION	WITNESS	ID	AD	EXHIBIT SENT IN TO JURY (DATE/TIME)	GOVERNMENT OBJECTIONS
365	4/16/2013	USA-REL-0108851	Email chain between C. Whitehead and A. van der Zwaan regarding invoice					No Objection
366	4/16/2013	USA-REL-0196868	Email from A. van der Zwaan to G. Craig, C. Sloan, and C. Whitney attaching documents					No Objection
367	6/4/2013	USA-REL-0236972	Email chain among A. van der Zwaan, A. Prender, C. Whitney, et al. regarding billing					Hearsay
368	6/5/2013	USA-REL-0000226	Ministry of Justice payment					No Objection